

In The UNITED STATES DISTRICT COURT  
For The EASTERN DISTRICT OF NORTH CAROLINA

FILED

FEB 08 2021

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY  DEP CLK

Plaintiffs,  
Daniel Felix,  
Homeless Cats Of Hatteras Island, NC,  
Non-Property Animals Of Hatteras Island, NC

v.

CIVIL CASE NO. 2:21-CV-7-B0

Defendants,  
Sheriff Doug Doughtie  
In his official and individual capacity  
Deputy Donovan Ruth  
In his official and individual capacity  
962 Marshall C. Collins Drive  
PO Box 757  
Manteo, NC 27954  
252-475-5980

The County Of DARE COUNTY in North Carolina

Dare County Attorney Robert Outten  
In his official and individual capacity  
954 Marshall C. Collins Drive  
PO Box 1000  
Manteo, NC 27954  
252-475-5811

Dare County Board Of Commissioners  
In their individual and official capacities  
members:  
Chairman Robert Woodard  
Vice Chairman Wally Overman  
Rob Ross  
Steve House  
Jim Tobin  
Danny Couch  
Ervin Bateman  
All in their individual and Official capacities  
954 Marshall C. Collins Drive  
PO Box 1000  
Manteo, NC 27954

District Attorney Andrew Womble  
In his official and individual capacity  
District Attorney Jeff Cruden  
In his official and individual capacity  
District Attorney Jennifer Bland  
In her official and individual capacity  
200 East Colonial Avenue  
Elizabeth City, NC 27909  
252-331-4530

NC Attorney General Josh Stein  
In his official and individual capacity  
NC Department Of Justice  
PO Box 629  
Raleigh, NC 27602

NC Governor Roy Cooper  
and  
NC Governor McCrory  
Both in their individual and official capacities  
20301 Mail Service Center  
Raleigh, NC 27699-0301

## **PLAINTIFF IS REQUESTING A JURY TRIAL**

**SERVICE OF PROCESS:** The defendants for Dare County NC, Sheriff Doughtie, Deputy Ruth, Dare County Attorney Outten, the entire Dare County Board Of Commissioners were all contacted repeatedly in writing and by phone requesting their correct Registered Service Of Process Agents and each refused to provide this information and nowhere is this information published. The Court should consider them not having such service of process agents and service should be proper with summonses against all named defendants on the Dare County Attorney and Dare County Board Of Commissioner's Chairman.

Likewise, the defendants DA Womble, DA Cruden and DA Bland all refused on multiple occasions to provide their Registered Service Of Process agents and all declined to provide such public information. The Court should consider them without such service of process agents and proper service to be made on the NC Attorney General who is also a defendant along with summonses for each.

The Court should note that in a prior proceeding the court erred by dismissing plaintiffs case against these defendants for not serving their registered service of process agents when none exists or is being made for the public. The Court should correct it's own error from then and either provide the correct service of process agents and their addresses to be served, sight all defendants for the deliberate obstruction of justice, or consider plaintiffs efforts to serve each defendant correctly sufficient to move forward with this lawsuit.

## **COMPLAINT**

The Plaintiff, Daniel Felix, respectfully submits this COMPLAINT against defendants: Deputy Donavan Ruth and Sheriff Doug Doughtie of the Dare County Sheriff's Dept. of North Carolina, the county of Dare County of NC, District Attorney Jeff Cruden, District Attorney Andrew Womble, District Attorney Jennifer Bland of the NC District 1 District Attorney's Office, the entire Dare County Board Of Commissioner, NC Attorney General Josh Stein and both NC Governors Cooper and mcCrory. The complaint is as follows:

On multiple occasions Deputy Donavan Ruth has acted in violation of Plaintiff's civil rights and constitutional rights and has caused the Dare County Sheriff's Dept. to act in violation of Plaintiff's civil rights. This has resulted in depriving Plaintiff of his FREEDOM OF SPEECH, his right to PETITION GOVERNMENT, his EQUAL PROTECTION OF LAW, has placed Plaintiff in harms way, and has caused damage to him personally. Deputy Ruth acted outside his immunity under color of state law and is also personally responsible for the constitutional and civil rights violations. Deputy Ruth obstructed justice on multiple occasions and prevented Plaintiff from seeking justice from outside authorities. Deputy Ruth has therefore committed criminal acts against Plaintiff. Deputy Ruth has openly engaged in and facilitated the GANG STALKING of Plaintiff which resulted in the bombing of Plaintiff's home and multiple death threats made by the person recruited to assist in the Gang Stalking.

On multiple occasions to be provided through Discovery Sheriff Doughtie has acted in

violation of Plaintiff's civil and constitutional rights and has deprived Plaintiff of his EQUAL PROTECTION OF LAW,his RIGHT TO FREEDOM OF SPEECH,AND RIGHT TO PETITION GOVERNMENT. Sheriff Doughtie made threats to Plaintiff and tried to extort payment from Plaintiff. Sheriff Doughtie made threats of civil suits to obstruct Plaintiff from reporting the violations to outside authorities and obstructed justice to prevent Plaintiff from seeking justice for crimes committed against Plaintiff and for crimes witnessed by Plaintiff.Sheriff Doughtie has openly engaged in and facilitated the GANG STALKING of Plaintiff and death threats made to Plaintiff.

Both District Attorney Womble and Cruden have denied Plaintiff EQUAL PROTECTION OF LAW on multiple occasions and have obstructed justice for crimes committed against Plaintiff and crimes Plaintiff has witnessed. District Attorney Cruden went further by assisting Sheriff Doughtie and Deputy Ruth in their obstruction of justice by conducting a false prosecution to silence Plaintiff and has ignored death threats and gang stalking of Plaintiff and his family to facilitate the cover up and false prosecution.

**1. CLAIM:Sheriff Doughtie, Deputy Ruth and others in the Dare County Sheriff's Department engaged in and conspired to violate Plaintiff's rights to Equal Protection Of Law, discriminated against him for being an animal advocate, committed obstruction of justice to hide their criminal acts, initiated and participated in a Gang Stalking and recruited other members of the community to Gang Stalk Plaintiff, engaged in acts to cover up the Gang Stalking, allowed for the bombing of plaintiff's home and covered up the bombing with an abuse of power, committed acts of animal cruelty against homeless cats and other animal in violation of the Animal Cruelty Law of NC,conspired to and facilitated the**

**killing of cats and other animals in violation of the Animal Cruelty Laws of NC, has obstructed justice in the illegal killing of homeless cats and other animals,engaged in a public campaign to provide false information to the public in a cover up of the killing of those animals, has engaged the help of District Attorneys Womble,Cruden and Bland for the purpose of bringing false charges against plaintiff to silence him from exposing the corruption and as a threat to stop publicizing the corruption and illegal animal killings,and has facilitated the continuation of all such acts to the present.**

1. Deputy Ruth has engaged in a scheme to convince the public and other Federal, NC State agencies and the Office of NC Governor Mc Crory and Cooper that Plaintiff is suffering from a mental illness that Ruth fabricated for the purpose of obstructing justice plaintiff was seeking from these agencies in connection with an 8 year ordeal of cat and animal killings that plaintiff was the victim of, the July 3rd, 2017 bombing of his residence, plaintiff being held at gunpoint and threatened with murder in Aug.of 2016, Hatteras NC community members attacking plaintiff for his political views as an environmentalist and animal advocate, and any and all attempts to receive a proper investigation into those matters and other corruption in Dare County. Deputy Ruth's actions were deliberate in his effort to discredit plaintiff as a witness and to obstruct justice for the crimes happening to plaintiff,that plaintiff had witnessed, and to protect others in the Dare County Sheriff's Dept. from being investigated for their part in the crimes and deceit. Sheriff Doughtie, after being notified of the obstruction of justice and civil rights violations, then participated in and facilitate the hate campaign and gang stalking of Plaintiff.

A) and Sheriff Doughtie also is engaged in conduct to deny Plaintiff "any" protection of law from approx. 2009 to present. Transcript of 911 calls and operator notes for non-emergency police calls during this period more than provide proof of the complete lack of Equal Protection Of Law and other civil rights violations. E-mails to Sheriff Doughtie and Deputy Ruth from Plaintiff explaining the events in real time during this period show both knew of the crimes committed against Plaintiff and witnessed by Plaintiff and of the obvious danger ( a danger any average person would acknowledge and act on) to Plaintiff and the general public including acts against wildlife and domestic cats that resulted in their deaths. Sheriff Doughtie and Deputy Ruth were required by their duty and responsibility to act but refused in an attempt to punish Plaintiff and make him suffer. The e-mails and transcripts for calls for police service show a lengthy pattern of obstruction of justice and denial of protection of law still ongoing.

B) Sheriff Doughtie facilitated the creation of false reports made against Plaintiff for wrongdoing that never occurred to cover up the lack of police protection being denied Plaintiff. An example of the stark contrast of Sheriff Doughtie's and Deputy Ruth's abuse of discretion and bias against Plaintiff is that on approx. 7 occasions the Sheriff's Dept. delivered letters of no trespass against Plaintiff after Plaintiff reported cats being brutally illegally killed,poison being left to kill others, animals being deliberately run down in front of Plaintiffs home on almost a daily basis and other animal abuses reported. Sheriff Doughtie made no effort to seek justice for the animal abuse and killings yet recruited the animal abusers and cat killers to gang stalk Plaintiff and make up false reports of trespass then took strict action to assure Plaintiff could be prosecuted should any trespass did occur. This assured that the animal abuse would continue and that the only

witness, Plaintiff, would not be able to recover the dead bodies as evidence. To date 62 cats have been killed during this period and no effort has been made to bring any of the killers to justice. Likewise, 4020 (yes four thousand twenty) animals have been deliberately run down in front of Plaintiff's home by the recruits of Sheriff Doughtie's gang stalking yet no action has been taken to stop the deliberate run downs. Pictures of the 4020 animals deliberately run down have been widely distributed to outside authorities by Plaintiff seeking an end to the abuse but Sheriff Doughtie manages to obstruct any justice for these animals every time reveling in the mental abuse to Plaintiff. The sheer number of documented/photographed animals deliberately run over would require acts to stop the violence yet Sheriff Doughtie has taken none. And the Gang Stalking still continues even now by recruits who regularly floor their vehicles in an attempt to run down animals in front of Plaintiff's home. Some now even floor their vehicles knowing Plaintiff will hear it to simulate an animal run over just to keep up the mental abuse that the gang stalking is causing. A number of people, known drug dealers and bullies are participating in the gang stalking with Sheriff Doughtie's and District Attorney Cruden's blessing. Plaintiff video taped one of Sheriff Doughtie and DA Cruden's stalkers simulating a run down after they made several trips by in a short time period and Plaintiff was threatened with prosecution for videoing the gang stalking. DA Cruden has been made aware of the video of the gang stalking yet made no effort to stop the threats. The threats and gang stalking by this individual, and others known to DA Cruden, have been occurring on almost a daily basis from Jan. 2018 to present as part of the scheme created by Sheriff Doughtie, Deputy Ruth, and DA Cruden to create a false criminal history for Plaintiff of a cyber stalking b(2) "repeated communications"

with no communication ever taking place while the alleged criminal victims of the cyber stalking openly make death threats and daily stalk Plaintiff and his family-an obvious deliberate abuse of discretion any average person would see and understand.

C) Sheriff Doughtie and DA Cruden have openly protected a drug dealer responsible for or directly involved in the overdose death of Andy Peele. Tiffany Bock was over heard by Plaintiff contemplating with her uncle, Eddie Ochs a known drug addict, whether the opioids she sold or gave to Peele or the meth sold to him by her friends caused his overdose death. Tiffany Bock is currently being protected from prosecution after Plaintiff informed Gov. Cooper that he witnessed her selling and buying drug for a six year period. Plaintiff witnessed Tiffany Bock selling drugs to Casandra Armored, an employee at the Quarter Deck Restaurant, who was arrested with the drugs-no attempt was made to arrest the Bocks in connection to the drugs. Both Tiffany and Chris Bock and their friends are participating in the gang stalking of Plaintiff with Sheriff Doughtie and DA Cruden's blessing. Kevin Morris is another drug dealer, who is responsible for the majority of cocaine distributed south of Oregon Inlet, being protected by Sheriff Doughtie and DA Cruden after Plaintiff explained to Gov. Cooper that Plaintiff had witnessed Morris's drug dealing since high school. Morris is participating in the gang stalking of Plaintiff on almost a daily basis with Sheriff Doughtie's and DA Cruden's protection. Other opioid drug dealers are being protected because they provide illegal steroids to deputies. Both Sheriff Doughtie and DA Cruden have facilitated and caused overdose deaths by their abuse of discretion and protection of drug dealers who are and sell to the affluent members of the community.

D) In a phone call approx. Oct. 2016 Sheriff Doughtie threatened Plaintiff by stating



quote" If you put my name on the internet one more time,I might not get any money out of you but you are going to know I was there!". Besides the obvious threat to deprive Plaintiff of his right of freedom of speech against an elected official, at this point in time it is a threat to obstruct justice by preventing Plaintiff from exposing the corruption on Hatteras Island and acts committed by Sheriff Doughtie himself. It is also an admission Sheriff Doughtie had previously as reported via e-mails to Gov. Cooper attempted to extort money from Plaintiff in retaliation for his online petitions at the start of Plaintiff reporting the crimes against cats. It is also a candid admission Sheriff Doughtie would cause Plaintiff to suffer if he persisted in exposing the corruption occurring Plaintiff was witnessing. And that threat is playing out today by the gang stalking of Plaintiff and Sheriff Doughtie and DA Cruden's refusal to stop it.

2. In July or Aug. of 2016 plaintiff was held at gunpoint on Ships Timbers Road in Frisco NC by a crowd of friends of a home owner named John Guido who threatened him with murder,held him against his will there at gunpoint,and was attacked by a drunken angry mob of people spewing hate for plaintiff for his acts to provide humane support for the stray cats living there. Plaintiff was legally there by permission from another home owner, Dr. Kayota. Plaintiff called 911 twice indicating each time his life was in danger and it was an emergency and the Dare County Sheriff's Dept. took 3 hours to respond and did not respond until plaintiff made a 3rd 911 call. Then when they did respond Sheriff's Deputies,one of which was Deputy Stowe , made no effort to find or arrest the gunman. This was an event in a long series of refusals by the Dare County Sheriff's Dept. to respond to plaintiff's calls for police service.

3. Another incident even more serious in nature was the Dare Sheriff's Dept.'s response

to plaintiff's 911 calls from July 3rd, 2017 made at approx. 7:00pm when plaintiff's home and cat rescue compound was bombed with a commercial grade rocket with the explosive force of at least one stick of dynamite. The bombing came just a week or so after plaintiff had a death threat note left on his truck's windshield. No effort was made to catch or identify the bomber. No effort was made to question witnesses. When plaintiff called 911 again, to have it recorded that the responding deputies were not providing any enforcement of the law, another deputy came and threatened to arrest plaintiff for using the 911 service and reporting it as an emergency. When plaintiff argued that it was an act to bomb him, his rescued cats, and could have caused death or serious injury, the deputy called plaintiff a quote: "asshole" and walked off. It could not be more clear that there was an ongoing policy or attitude of disregard for plaintiff and his home family and pets. The origin of which traces back to Deputy Ruth's theory and personal opinions of Plaintiff. Deputy Ruth then obstructed justice by telling the Federal Bureau Of Investigation, the NC State Bureau of Investigation and NC Governor Cooper's Office that no bombing had occurred when in fact it had and Plaintiff had received a death threat just prior to it.

4. Prior to the other events listed plaintiff was experiencing assaults for his animal advocacy and efforts to help the abandoned cats. Many calls for police service went unanswered by the Dare County Sheriff's Dept. over an 10 year period. In this time over sixty two (62) cats were illegally killed and documented by plaintiff and four thousand twenty (4020) other animals, not including birds and turtles, were deliberately run over in front of plaintiff's home which he photographed and sent via e-mail to law enforcement and other authorities. None of which the Dare County Sheriff's Dept. reacted to or

made any effort to seek justice for. Hatteras Island has an ongoing vendetta against environmentalists and animal advocates. In a community video sponsored by the Dare County Board Of Commissioners by their appearances on it, Dare County depicts the Audubon Society and environmentalists as Quote: " AMERICAN TERRORISTS" and demands the ENDANGERED SPECIES ACT be repealed. This political point of view has become mandatory for Hatteras Island and this is being played out with acts of violence against animals living their or any persons trying to advocate or help them. It is well documented these same kinds of acts were used upon the Audubon Society to evict them from the island and the same indifference by the Dare County Sheriff's Dept. was evident in reacting to their complaints of threat and violence. And this political point of view is being enforced by the Dare County Sheriff's Dept. and their deputies who agree with it. Plaintiff was assigned the status of environmentalist by his acts to help the animals and labelled that by the Dare County Sheriff's Dept. who act out their dislike of plaintiff for his contrary viewpoint to theirs. It results in a complete lack of proper police action each time plaintiff has cause to request police service. Public records of calls for police service over the past 9 years show a complete lack of responsible police action to his calls. These calls were made when cats were being poisoned, drowned and killed in other horrible ways, when people were deliberately running down animals crossing the road in front of plaintiff's home or driving at such a high rate of speed that the danger was obvious, stalkings by people wishing to threaten and put plaintiff in fear, and other incidences resulting from plaintiff trying to seek justice for these animals. To date 4020 animals have been deliberately and negligently run down in front of plaintiff's house over the last 10 years, in many case, while plaintiff and his family watched in horror. Worse

still 10 percent of the time the animal was still alive and plaintiff was forced to remove it from the road and give it whatever medical attention was available without any of the necessary safety equipment. It is a fact plaintiff had to photograph and remove the bodies of the dead at his own peril in traffic that was posted at 45 mph but was regularly going 55-65 or more mph while Dare County Sheriff's Deputies ignored his calls to help the animals and stop the constant speeding. Records of complaints to NCDOT and the NC HWY Patrol will confirm the legacy of this claim. At no time did Deputy Ruth, Sheriff Doughtie, or the Dare County Sheriff's Dept. recognize or consider the danger to plaintiff from the constant reckless speeding or the deliberate animal run downs. And at no time did they take any steps to bring the situation to an end so plaintiff could enjoy his property and not have to put his self in danger to help the innocent animals. E-mails with pictures of the dead to Sheriff Doughtie, Deputy Ruth, Senator Kay Hagan, Governor Mc Crory, Governor Cooper, Director of the National Park Service, to the NCDOT, and NC Attorney Generals' Office, that literally number in the thousands validate this claim. And the situation as it is described still exists without law enforcement intervention.

5. When plaintiff decided to seek help from the public to put pressure on elected officials to act to help the cats and other animals being killed on Hatteras Island by doing online petitions, Deputy Ruth, Sheriff Doughtie, and other unknown people working for the Dare County Sheriff's Dept., began the campaign to discredit plaintiff by fabricating the "mental illness" theory. Despite the fact there was evidence to support the claims made in plaintiff's petitions and a multitude of photographs of dead animals numbering over 4000, no meaningful investigation was ever made by the Dare County Sheriff's Dept.

Sheriff Doughtie made a press release depicting plaintiff's petitions as a hoax and the petitioner as mentally ill. This point of view was fabricated to cover up the Dare County Sheriff's Dept.'s lack of proper police action to prevent the cat and animal killings and to prevent plaintiff from seeking justice for multiple illegal acts of animal cruelty which they had improperly and negligently ignored. There consistency in denying that acts of animal cruelty happening is a product of their adherence to and enforcing of the political views mandated by the hate environmentalist video the community had published and the Dare County Sheriff's Dept. had adopted. It was apparent that the fact animals were being killed and animal cruelty was epidemic on Hatteras Island supported if not proved the Audubon Society's and Southern Environmental Law Centers claims in their lawsuit. The Dare County Sheriff's Dept. thus had a vested interest in denying these killings were even happening and they acted to suppress the killings and to silence plaintiff from making that information public. At the point of their press releases the Dare County Sheriff's Dept. had evidence and photographs of the killings and obstructed justice by suppressing the outcome those pictures and evidence might have had on ongoing litigation about the beaches. The result for plaintiff was equally devastating and animals continued to die unabated by law enforcement. The fact the Dare County Sheriff's Dept. conspired to discredit plaintiff with a fabrication of mental illness shows a knowing act to obstruct justice and to suppress information vital to the ongoing litigation by the Southern Environmental Law Center in the United States District Court. The Dare County Sheriff's Dept.'s knowing withholding of investigation and proof supplied by plaintiff by way of photographs of the illegally killed animals which they knew to be vital to the lawsuit as stated to the Sheriff in multiple e-mails, shows a

blatant effort to defraud the US District Court of meaningful evidence and an effort to use the power of their office to manipulate the outcome of a federal lawsuit against those they politically disagreed with.

**2. CLAIM: Sheriff Doughtie, Deputy Ruth and others in the Dare County Sheriff's Dept., as well as District Attorney Womble, DA Cruden and DA Bland have engaged in and facilitated the protection of wealthy white drug dealers from criminal prosecution while discriminatorily arresting and prosecuting poor drug users, have all tried to silence plaintiff for being a witness to these crimes, have obstructed justice to cover up their roles in these crimes, have caused multiple deaths by drug overdose while protecting the wealthy white drug dealers who sold the drugs causing the deaths, have all covered up the rape of a 14 year old girl to protect a deputies pastor father, have engaged in silencing plaintiff from speaking out about the rape of his 14 year old girl friend, have engaged in silencing plaintiff from speaking out about his own sexual assault that left him handicapped for life and to protect the wealthy community members responsible who support all their careers, all have obstructed justice and have altered evidence to cover up their roles in those crimes, and have continued to commit these acts to present.**

6. Recently, Deputy Ruth and the Dare County Sheriff were given by plaintiff the names of two known drug dealers, that plaintiff had witnessed selling cocaine, pot and opioids on many occasions, and they made no response to obtain more information or investigate. When plaintiff contacted Governor Coopers Office with that information Deputy Ruth or others at the Dare County Sheriff's Dept. again used the "mental illness"

fabrication to discourage an investigation by them and as a result obstructed justice. The information was in response to their claims the public needed to assist them in obtaining drug leads. But these leads were against a NCDOT Supervisor and a drug dealer who sells to affluent community members. People the Dare County Sheriff wanted to protect from prosecution and who are part of the ongoing hate environmentalist movement. And people who donate to the political careers of both the Sheriff and members of the Dare County Board. And by now Deputy Ruth and Sheriff Doughtie were seeking revenge on plaintiff for his actions to alert outside authority. The names of them, another drug dealer, and a Pastor who was involved in a rape in the 70's of a 14 year old girl got published on one of the petitions seeking political change to the Dare County Board and Governor Cooper. The petition update alleged collusion between the Dare Board members and Dare County Sheriff with these criminals due their lack of response to petitioner and as part of the ongoing conspiracy and cover up as described here within. And what would be a logical conclusion considering the public outcry for crimes such as these to be taken seriously. The update was then deleted a few days later. However, Deputy Ruth had jumped at an opportunity to abuse his discretion to punish plaintiff and fabricated 3 charges of cyber stalking to silence and end the petition. Regardless of the fact the petition was without question federally protected free speech and the petition a federally protected right to petition government and that the statements were protected by plaintiff's right to report as witnessed crimes. The exemption of the cyber stalking law also assures an exemption "quote"to provide lawful information to others"and no one can dispute it was lawful information provided to Gov. Cooper. Deputy Ruth vindictively charged plaintiff anyway. And when

plaintiff was arrested told the magistrate plaintiff was a quote: "asshole" so that plaintiff would be given an astronomically high bond to try and keep him in jail. Plaintiff's bond was an unheard of amount of \$30,000.00. When plaintiff made bond Deputy Ruth demanded plaintiff remove all the political signs about the animals killed and the petitions from in front of his house. Knowing that the charges were completely meritless plaintiff felt fear of further reprisal and was forced to remove all the political petitions from the internet and is afraid to voice his political views any longer. Deputy Ruth's actions were deliberate acts to silence plaintiff and prevent him from voicing his political view thru federally protected freedom of speech and to prevent him from petitioning government. Deputy Ruth and the Dare County Sheriff's Dept. gave no thought to the danger plaintiff was in from these criminals and made no effort to protect plaintiff from reprisal. Plaintiff is now being stalked and threatened by these criminals without reaction from the Dare County Sheriff's Dept. and they have ignored the calls for police service from another residence of the home. Deputy Ruth's disregard for the plaintiff, his safety, and his rights could not be more evident. Deputy Ruth has also flagrantly disregarded the danger to the public by his desire for revenge on plaintiff by empowering the criminals to continue their drug dealing without fear of prosecution and the possibility of overdoses from those drugs. Nothing about Deputy Ruth's involvement in the false malicious prosecution of plaintiff could be deemed appropriate police actions. It is clearly possible that Deputy Ruth contacted the drug dealers about their names on the petition as a means to provoke a violent act by these drug dealers against petitioner. Deputy Ruth could not have been unaware of the danger his acts imposed on plaintiff as they would be obvious to any normal person. And again Deputy Ruth obstructed justice by



using his fabricated reasoning to prevent the other Federal and State agencies from investigating plaintiff's claims against these drug dealers and the statutory rapist.

**3. CLAIM: Sheriff Doughtie, Deputy Ruth and others in the Dare County Sheriff's Dept. illegally used public funds and resources to threaten and intimidate plaintiff by serving him unfounded trespass letters from private citizens, this was done to intimidate plaintiff and fabricate false evidence of crimes never committed, it was a discrimination against plaintiff who was not offered the same service as the wealthy white community members, it was an illegal use of tax funds and resources, it was done to obstruct justice in the killing of homeless cats, it was done to silence plaintiff from seeking Equal Protection Of Law from outside sources, it was done to bring false information to the public to cover up the animal abuse crimes happening because of these defendants, it was a violation of Equal Protection Of Law, it was done to violate plaintiff's right to free speech, and it had the result of obstruction of justice in multiple multiple animal killings by the very people he was serving the letter on their behalf. Sheriff Doughtie and Deputy Ruth and others were aiding and abetting the crimes of animal abuse and animal cruelty against multiple homeless cats near those properties and failed to provide Equal Protection Of Law to those animals who are protected by the NC Animal Cruelty Law and for plaintiff who witnessed and reported those crimes.**

7. Sheriff Doughtie and Deputy Ruth both used Dare County Sheriff's Dept. resources to serve letters from private citizens on plaintiff that revoked plaintiff's freedom to use public places and public access. So called "Trespass" letters were generated by several private citizens, citizens who were committing crimes against plaintiff and were engaged

in the hate environmentalist activities, were delivered by sheriff's deputies with the full weight of orders coming from the clerk of court. These letters were delivered without any legal justification and were used for the purpose of intimidation to deprive plaintiff of several of his rights. The letters were so broad spectrum that they invoked trespass on property that was not posted and had no marked boundaries but now invoked plaintiff to be held criminally responsible for violation of their invisible and imaginary property lines. The letters went as far as to make plaintiff responsible for knowing each and every property owned by the authors of each letter and know their boundaries as well. The letters invoked trespass for areas of public right of way, public access, areas open to all members of the public, and places not owned by authors of these letters. It blocked plaintiff from being able to use public streets, from going to the public beach near his neighborhood known as the Cape Hatteras National Seashore. And the letters did not stop at that they also included any persons in any way affiliated with plaintiff invoking that plaintiff would be held criminally responsible if someone associated with him or could be associated with him were to violate the order. The letters were designed to intimidate plaintiff and revoke his rights to move about with any freedom or fear of wrong doing. A total of ten letters revoking access to any and all properties owned or controlled by the authors, including Midget Realty who control thousands of properties, were served on plaintiff with no justification or Due Process Of Law. Sheriff's Deputies then began leaving messages of trespass on plaintiff's voice mail to not trespass on properties in places plaintiff has never gone or even knows the location of done on behalf of anyone wanting to make plaintiff suffer for his political point of view or people who hate him for his work to help the cats. Then these acts by the Sheriff's Dept. to

restrict plaintiff's freedom to move about got worse. Other realty companies finding out that Midget Realty had used the Sheriff's Dept. to serve letters on plaintiff and believing the fabricated mental illness story the Sheriff's Dept. was circulating all served plaintiff trespass notices for all their properties which left little or nowhere plaintiff could legally go without violating some ones order. And plaintiff was made well aware of his loss of freedom by Deputy Ruth who went to Home Owner's Associations meetings in Runboat Circle and persuaded more and more homeowners to join the trespass letter which was then amended and reserved by the Dare County Sheriff's Deputy, Deputy Ruth. Deputy Ruth then used tax payer resources to play out his vendetta against plaintiff by installing cameras on behalf of these persons to try and catch plaintiff being somewhere restricted by these letters. Other Dare County Deputies wanting to also punish plaintiff for his political views assumed any time anyone fed a stray cat it was plaintiff trespassing and they began creating a false history of records indicating plaintiff had trespassed when plaintiff was never there at all. This false history was now being used as justification for the fabricated mental illness story. Plaintiff was never charged with trespass prior to the letters, was never charged with any acts against any persons constructing the letters prior to the letters, and still has not committed any trespass against those persons. However, plaintiff has now for 3 years been restricted to his home and only a few public places he feels he is safe to go. Deputy Ruth continues to intimidate plaintiff with further threats of more legal retaliation by his abuse of the authority he has been given by his job as Sheriff's Deputy.

**4. CLAIM: Sheriff Doughtie and Deputy Ruth deliberately and maliciously invented a mental illness plaintiff does not have for the purpose of obstruction of justice**

**and covering up their acts of violating plaintiff's Equal Protection Of Law Rights, to silence and discredit his Freedom Of Speech Rights, and to cover up all the above mentioned and other crimes and rights violations they had committed and were facilitating.**

8. A community member, Erin Lee Meekins, 49289 NC Hwy 12, Buxton, NC, identified the Dare County Sheriff's Dept. as the source of the "mental illness" fabrication with a post she put on plaintiff's facebook page stating quote: "don't believe a word this man is saying, the police say he is crazy". Other members of the Runboat Circle, Hatterasman Homeowners Association, whose names are unknown to plaintiff, accidentally revealed to plaintiff that Deputy Ruth had informed them of plaintiff's so called "mental illness" and was using plaintiff's criminal record from 1992, 26 years ago, to scare members of the community from associating with plaintiff. Even after Sheriff Doughtie was informed of this by plaintiff's e-mails, and plaintiff informed Doughtie and Ruth he was a prisoner still claiming "Actual Innocence" who had put an Actual Innocence Clemency Petition on a Virginia Governor's desk and that plaintiff was still going to file a Writ Of Actual Innocence in VA to contest the conviction, they both used this to scare the public and justify their fabrication of mental illness. The fact the incident occurred so long ago in the past did not prevent Deputy Ruth and Sheriff Doughtie from continuing to punish plaintiff with it or from using it to further their vendetta against plaintiff. Deputy Ruth and Sheriff Doughtie are still using this ancient criminal record to inflame the community against plaintiff and to keep him from gaining any outside help or support which includes help from any animal advocate sources plaintiff has solicited for help for the cats and animals. This has caused plaintiff tens of thousands of dollars in financial damage to his

business and tens of thousands of dollars he has had to put up out of his pocket to save the cats that would have been given by donations or that have been donated to organizations who would have otherwise offered plaintiff financial help with the cats. These community members are now participating in the Gang Stalking of Plaintiff at Sheriff Doughtie's and Deputy Ruth's prompt and are responsible for the bombing of Plaintiff's home.

9. The violation of plaintiff's civil rights is still ongoing in many ways. While some of the acts occurred many years ago, they are all part of an ongoing continuing series that has not stopped. Any statute of limitations will not begin until the acts, the discrimination, and constitutional violations cease and their damage stops. A purpose of this lawsuit is to put these acts to an end and thus this lawsuit is timely filed in compliance with all Federal Rules Of Civil Procedure. Plaintiff reserves the right to amend his petition against all future acts in this ongoing civil rights violation and the damages that may occur from them. Petitioner reserves the right to name and add defendants should more of them be revealed during the Discovery process.

**5. CLAIM: Sheriff Doughtie, Deputy Ruth, Deputy Stowe, and others in the Dare County Sheriff's Dept. discriminated against plaintiff's disabilities protected by federal law and passed them off as a mental illness plaintiff does not possess to the public to shame plaintiff into silence.**

10. Deputy Ruth, Sheriff Doughtie, and the Dare County Sheriff's Dept. have discriminated against plaintiff for his disability. Plaintiff suffers from a partial lack of hearing from living for decades under the jet noise of NAS Oceana in Va . Beach. Plaintiff's partial deafness causes him to speak more loudly than a normal person which

they have repeatedly labelled as "strange" and used it further their mental illness fabrication. Plaintiff also suffers from late stages of scoliosis of the spine, the pain causing plaintiff to grit and frown while he moves about or walks or talks. The Dare County Sheriff's Dept. also mischaracterizes this as "strange" behavior and has used this genetic deformity to slander and maline plaintiff. Plaintiff has no remedy for these disabilities but they are publicly accepted and not to be discriminated against by law. The Dare County Sheriff's Dept. has used a physical deformity/disability to further their desire to label plaintiff with a mental disorder which he does not have. Talking loud by a partially deaf person and a person with a deformity gritting in pain is not an indication of mental illness in any stretch of the imagination which shows the Dare County Sheriff's Dept. desire to only discredit plaintiff's ability to be taken seriously when he informs others about the ongoing corruption in Dare County and the crimes that he witnessed which shed a negative light on the communities political views.

**6. CLAIM: Sheriff Doughtie, Deputy Ruth, District Attorney Womble and DAs Cruden and Bland fabricated false charges against plaintiff for cyber stalking to silence his Right To Free Speech, to obstruct justice in the crimes witnessed by plaintiff and crimes he was a victim of, with no evidence any crime had occurred, deliberately abused the NC Cyber Stalking Law to obstruct justice and cover rights violations of Equal Protection Of Law committed against plaintiff, to protect wealthy white criminals at large in the community they favored, to falsely arrest, falsely imprison and falsely maliciously prosecute plaintiff for a crime there was not even probable cause to believe plaintiff had committed and to cover up the criminal acts and rights violations committed by each of them.**

11. Deputy Ruth issued warrants on Dec. 29th, 2017 against Plaintiff claiming an update on his constitutionally protected change.org petition, a petition against a Dare County Cat Ordinance directed at the Dare County Board Of Commissioners and NC Governor Cooper, was an act of Cyber Stalking. Plaintiff was arrested on Jan. 8th, 2018 and charged with 3 counts of cyber stalking for statements that are federally protected free speech, a US Constitutional Right. Plaintiff's right to freedom of speech has clearly been violated. Then Deputy Ruth went another step further to violate plaintiff's rights. Ruth personally made it a condition of his astronomically high \$30,000.00 Bond that plaintiff remove ALL petitions from the internet and all of his political signs from his yard. Plaintiff's right to petition his government and his freedom of speech has been violated by Deputy Ruth. And it was revoked without Due Process Of Law. Plaintiff had removed the so called offending update just 5 days after it's inception, even though plaintiff did not legally have to, which was several days before plaintiff even knew he was going to be arrested for it. Still Deputy Ruth demanded all content of the political petition be deleted, the petition itself, and all other petitions that were offensive to him on this and any other petition sites. And Ruth included any and all of the signs with the same political agenda be removed.

**7. CLAIM: Sheriff Doughtie, Deputy Ruth and others in the Dare County Sheriff's Dept. fabricated false reports and evidence to create a false criminal history of plaintiff's acts in order to obstruct justice and cover up their crimes and rights violations committed against plaintiff.**

12. Deputy Ruth has also continually used the same conspiratorial method of abuse on Plaintiff. Plaintiff has crimes committed against him, calls for police service, and when the

crimes are investigated Deputy Ruth always ignores evidence in Plaintiff's favor, refuses Plaintiff his lawful right to seek justice, obstructs Plaintiff's attempts to seek justice, collaborates with the people committing those crimes to do further damage to Plaintiff and in a vengeful abusive manner, then allows those criminals and helps those criminals to seek retribution against Plaintiff or those animals Plaintiff has feelings for.

This abuse by Deputy Ruth and others in the Dare County Sheriff's Dept., which include Plaintiff being held at gunpoint and attempted to being murdered in Aug. of 2016 and a 3 hour wait for an answer to his 911 calls and a bombing of his home on July 3rd 2017, going back almost 10 years without stop would be considered the most serious kind of mental abuse and bullying by any standards. A District Attorney, DA Cruden, of the Dare County District Attorney's Office has assisted Deputy Ruth in his abuse as either a co-conspirator or as a negligent accomplice by consistently denying Plaintiff justice for crimes committed against him and now conspiring to prosecute Plaintiff for using his right to freedom of speech to inform the public and other authorities of the horrors of this ongoing abuse. This is evident by the seriousness of the crimes committed against Plaintiff, the danger of those criminals to the public, the fact Plaintiff alerted law enforcement of those crimes, that Plaintiff is protected by law as a witness and victim and is legally allowed to speak about them, yet DA Cruden chose to initiate a prosecution on Deputy Ruth's behalf against Plaintiff that puts Plaintiff in danger for his life and again denies Plaintiff the justice the law is suppose to provide for all people. Da Cruden should be considered a co-conspirator and later a defendant if facts arise that DA Cruden was aware of the abuse and rights violations being perpetrated by Deputy Ruth and chose to do nothing in his capacity as the District Attorney. Or materially took



part in denying or obstructing any justice Plaintiff was seeking. NC Attorney General, Josh Stein, has been informed of Plaintiff witnessing statutory rape and accessory to forcible rape in 1974 and 1975. One of these rapes occurred to Plaintiff's 14 year old girlfriend when he too was only 14 years old. This rapist is now gang stalking plaintiff with the help of Sheriff Doughtie. Plaintiff has also informed Stein that just after this rape he was the victim of a sexual assault at the age of 14 years old and that Plaintiff suffered an irreversible physical damage due to contracting a disease during the sexual assault. At no time has anyone attempted to uphold Plaintiff's rights as a victim, to seek justice on behalf of Plaintiff, or to prosecute the rapists. In fact the cyber stalking fabrication has prevented Plaintiff from speaking out about either incident, from seeking justice, and is designed to silence him on behalf of the predatory criminals who perpetrated the rapes. All of which is a violation of the US Constitution and NC State Constitution and every known victim and witness rights. Plaintiff will be forced to seek a WRIT OF MANDAMUS to obtain an investigation and prosecution.

**8. CLAIM: NC Attorney General Josh Stein has committed acts of obstruction of justice both criminally and civilly by failing to act on crimes witnessed by plaintiff as well as crimes committed against plaintiff. He has violated his oath of office by not providing Equal Protection Of Law to plaintiff and upholding his state and US Constitutional Rights to Freedom Of Speech and has violated those rights of persons and victims involved in the crimes reported, and he has violated the rights of the public to be protected from crimes reported by plaintiff and for the public to know of the crimes reported.**

13. NC Attorney General Josh Stein has been informed of the crimes of racketeering

and possible arson by Kevin Morris witnessed by Plaintiff yet has made no effort to seek justice or properly investigate. Attorney Stein has also been made aware of the new information Plaintiff has provided about the drowning of a child in Virginia Beach caused by Kevin Morris and a conspiracy to prevent the victims parents from knowing all the facts surrounding their child's death and their ability to seek a wrongful death lawsuit from the company Morris worked for at the time. Attorney Stein has been informed that while pending the false prosecution of Plaintiff for revealing the hidden details of the child's death the Virginia statute of limitations was running out on the parents ability to file a lawsuit for the wrongful death based on Plaintiff's new information. Attorney Stein has not made any effort to inform the parents of the new details he is in possession or as an officer of the Court to inform them a statute of limitations is expiring as a result of his and DA Cruden and Bland's negligence. This too is an obstruction of justice and a liability for the State Of NC in yet another attempt to cover up the corruption plaguing Dare County which Plaintiff attempted to expose. Likewise, Attorney Stein has made no effort to prosecute Tiffany Bock for her involvement in the overdose death of Andy Peele or notify the family of the potential liability the Bock's have in his death. Attorney Stein being the officer of the Court he is and a licensed attorney would be responsible for their loss due to his extensive knowledge of the laws and court procedures. Nor would he have immunity under color of state law for his negligence in forwarding the information to the victims families. Moreover, the multiple victims of Kevin Morris's sabotages would lose their rights to sue if Attorney Stein withholds that information from them and discourages a proper investigation. Also as victims NC guarantees them the right to be informed as Plaintiff has the right to expect information he is providing in

good faith to be acted upon with proper diligence required by law.

14. Lisa the 14 year old girl who got raped has a right even now, years later, to know the details of what was witnessed or said was witnessed whenever they become available. Sheriff Doughtie, DA Cruden, DA Bland, and NC Attorney General Stein are denying her that right and obstructing justice by keeping it from her. And the statute of limitations on her filing for damages is ticking away while DA Cruden and DA Bland create a smoke screen for the corruption that has been reported. A fact that I witnessed is that David Stowe in an effort to make his underage girlfriend more pliable for sex, left the island to purchase hard liquor for them to drink. In 1974-75 only 3/2 beer, a watered down version of the beer, was legally sold on Hatteras Island. The closest town hard liquor was sold was 50 miles north in Nags Head. When I left my 14 year old girlfriend Lisa with David Stowe and her cousins, to be home at 10:00 pm for school the following day, he had brought out the liquor and they were all drinking it. Including Raven her 8 year old cousin. This was the alcohol that got her so drunk she passed out and resulted in her rape. This is a detail of someone who committed accessory to a rape. And the victim has the right to know that and what Mark Speiss told happened the night of her rape. To try and hide those details from the victim and protect the person responsible is obstruction of justice whether criminal or civil.

**9. CLAIM: Sheriff Doughtie and another Deputy committed Obstruction Of Justice and altering evidence to obstruct justice by making the confession of an animal killer and abuser who admitted to removing food and water from starving kittens and cats plaintiff was legally feeding near his property to protect a wealthy white criminal who Sheriff Doughtie engaged to abuse his hate for plaintiff. Plaintiff was**

**the victim of the crimes as well as the cats and Sheriff Doughtie discriminatorily and maliciously made evidence to crimes committed against plaintiff disappear for the purpose of violating his rights to Equal Protection Of Law. He then altered police reports and conspired with the wealthy white criminal to have his case dismissed.**

15. Another blatant act of obstruction of justice occurred when I found out a man named Joseph Blackburn had been stealing my property used to feed the cats and their food and water. When I found my property in Joseph Blackburns trash and I had seen his shadow coming from the area I feed them each day I had no proof or could identify the thief. When I called the police Deputy Harris responded but after questioning Blackburn got a confession with which to charge him with. Blackburn said quote " I won't do it again" a blatant confession. And he was charged with petty theft. I still have the confession from that day written down and Deputy Harris's card with the original police report number on it-OCA 130727009- a police report that later disappeared and a different version was put in it's place. But I wanted him charged with animal cruelty also for taking the food from the kittens and their water in the 100 degree heat trying to cause their deaths-a felony under the animal cruelty laws "depriving of sustenance". When Sheriff Doughtie refused to charge him with animal cruelty. I contacted the Virginian Pilot Newspaper and they investigated. So 3 days before Blackburns trial, and phone records will confirm this, Sheriff Doughtie called me and tried to persuade me to drop the charges against Blackburn - a blatant act of obstruction of justice. But when I refused Sheriff Doughtie went even further to help Blackburn-Sheriff Doughtie made the confession and the police report with the confession on it disappear. So when I showed

up to court as the victim no District Attorney was there to represent me nor did anyone from the District Attorney's Office try to find me or question me. When I found Sheriff Doughtie and Deputy Harris out in the hall laughing and discussing the case I introduced myself and joined the conversation only then did I find out the confession had disappeared and there was no evidence with which to convict Blackburn and Deputy Harris was pretending he did not remember anything. So I was bullied then left without ever having a District Attorney even speak with me. A perfect example of the obstruction of justice, the recruitment of a gang stalker by Sheriff Doughtie, the blatant disregard for my rights as a victim, and the complete absence of any representation by the District Attorney's Office who obviously had already been brought on board by Sheriff Doughtie to deny me any justice.

**10. CLAIM: Sheriff Doughtie , Deputy Ruth, and District Attorney Cruden denied plaintiff Equal Protection Of Law for not pursuing and arresting a cyber stalker that was on plaintiff's federally protected petition against government bragging about his crimes of bombing plaintiffs home and his cat rescue compound and literally knocking the eye out of one of plaintiff's cats then came back on several times after plaintiff had Change.org, the petition site managers, delete his comments to brag about getting away with both the bombing and maiming of plaintiff's cat. Then when the cyber stalker came bag a fourth time making threats against plaintiff defendants again denied plaintiff Equal Protection Of Law. Defendant's then maliciously and discriminatorily fabricated the exact charges plaintiff was complaining of against him to silence him about the corruption he had witnessed. And violated plaintiff's victims rights and rights as a whistle**

**blower against the corruption.**

16. Three months before I was charged with cyber stalking I reported to Deputy Ruth and Sheriff Doughtie a real cyber stalker on my petition called Hobie Island. Hobie Island was making threats, making false statements about me personally, bragging about bombing my house and knocking the eye out of Tigger our cat that lost his eye to an act of animal cruelty supported by Sheriff Doughtie. Hobie Island is no doubt one of Sheriff Doughtie's gang stalkers. According to e-mails from Deputy Ruth, DA Cruden refused to identify or charge Hobie Island even though this was the third time he had been removed from my petition by change.org (a petitioner cannot remove other people's comments and must request it from change.org which takes months) and he signed it again to harass me some more. Change.org petitions are not either or petitions-you sign it when you agree with the petitioner and your original comments which are suppose to be directed towards the targets, in this case Gov. Cooper and the Dare Board, go with your signature to the targets. Then if you receive an update you can comment on the petitions updates. It is a closed forum which you cannot enter without signing the petition and opening an account with change.org. The updates are not a forum for dissenters or a place for comments against the petitioner or it's followers. Any dissenters entering the forum do so by deceit and for the purpose of harassing the petitioner or it's supporters. And in this case Hobie Island was clearly a cyber stalker signing the petition to harass. A blatant mistake Deputy Ruth stated while charging me was that quote "he had been monitoring the petition since it's inception" because it confirms that Deputy Ruth was not monitoring the petition for any crimes that might be committed against me but only to try and find an avenue to shut the petition down with

something he could claim was a crime I had committed on the petition. Deputy Ruth could not have missed the year and a half of Hobie Island's cyber stalking and more still could not have missed the bragging about bombing of my home something he is claiming never happened or the bragging about the knocking out of Tigger's eye confirming that was a deliberate act of animal cruelty, something Ruth has also tried to deny for his own personal abuse of the Plaintiff. And a blatant example of how DA Cruden was planning a malicious prosecution and refusing Plaintiff equal justice. And this stark contrast should be made with the evidence DA Cruden and Deputy Ruth are using to make the false cyber stalking charges against me where there was no communication to any of the alleged victims, who are themselves guilty of serious crimes. And the attempt to get these criminals investigated and charged for their crimes went unanswered by DA Cruden. Yet DA Cruden found criminal activity in the reporting of the criminals-how much more blatant can one be.

**11. CLAIM: Sheriff Doughtie, Deputy Ruth, and District Attorney Cruden, violated plaintiffs rights to Equal Protection Of Law when plaintiff had one of his kittens killed by breaking it's neck while alive to torment plaintiff by yet another wealthy white criminal in league and politically supportive of Sheriff Doughtie. This wealthy white criminals wife also happens to be another of the protected wealthy white drug dealers Sheriff Doughtie has protected. She is responsible for at least one drug overdose death and Sheriff Doughtie, Deputy Ruth and DA Cruden aided and abetted her crimes as well as the crimes of her husband for animal cruelty. These two later illegally killed 17 cats to spite plaintiff who was in the process of rescuing them with the help and direct protection of these defendants.**

**Defendants then engaged in acts to obstruct justice and silence plaintiff from exposing the corruption and killings.**

17. Another equally blatant act by Deputy Ruth and DA Cruden to obstruct justice was when they refused to charge Chris Bock with breaking one of our kittens necks and leaving it on the feeding board for me to find. An e-mail from Deputy Ruth after I had submitted an affidavit having witnessed the kitten killing stated DA Cruden found no probable cause with which to charge Bock. Contrast with DA Bland using the picture of the dead kitten as a cyber stalking communication against Bock she plucked off the cats facebook page where the 10 years of cat killing evidence is stored. The very pictures purpose was to preserve evidence of Bock's crime in the complete absence of Sheriff Doughtie collecting the body for the prosecution as evidence. Sheriff Doughtie and DA Cruden are saying that Chris Bock can break our kittens necks and leave them to torment us with but we are not allowed to possess photographs of our dead kitten or speak of the crimes committed against us because it bothers the cat killer. A felony act of animal cruelty is of no concern but the cat killer being annoyed by being called a cat killer a major threat to public safety. This is the standard being enforced upon the Plaintiff. A further act of obstruction of justice occurred when Deputy Ruth with the compliance of DA Bland tried to force Plaintiff to destroy 10 years of evidence of cat killing and abuse to satisfy the perpetrators of those crimes. A more blatant conspiracy to commit obstruction of justice to cover up Sheriff Doughtie's and their corruption could not exist but it does. A review of the Plaintiff's witnessed affidavit could not be more clear they are covering up this crime. And yet the District Attorney's Office is refusing to accept many other cats have been killed and much more evidence is available against



this particular criminal because they claim he is the victim of a cyber stalker who never communicated to him. Again, Plaintiff's have been victimized by this person over and over again and have reported it to the only law enforcement service available, Sheriff Doughtie and Deputy Ruth, and have never gotten any response yet this person gets police protection for a crime that does not exist. The killing of this kitten could not be a more blatant example of the abuse of discretion and lack of equal protection of law Plaintiff's are experiencing. And that it should not be over looked that the kitten is entitled to the protection of the animal cruelty law as a victim separate from Plaintiff's complaint.

18. Sheriff Doughtie illegally used uniformed sheriff's deputies and sheriff's dept. funds to deliver threatening letters on behalf of citizens. Sheriff Doughtie delivered to Plaintiff approx. 12 letters from Dare County citizens threatening Plaintiff with trespass prosecution for properties Plaintiff had not been on or had any desire to go to. It should be noted by the Court that the letters were for rental properties open to the public and public spaces such as the public beach accesses and pedestrian right of ways and several public streets. And the no trespass orders were broad spectrum such as any and all properties managed by Midgett Realty. Encompassing half the properties on the entire island. And none of which properties had any marked property lines or no trespass signs. The Sheriff was saying with all the letters-you leave your house I will arrest you for trespassing no matter where it is. And all of this was done on behalf of cat haters who where disgruntled by Plaintiff feeding cats on properties he had permission to feed on because no law was being broken so they could not inflict suffering on the homeless cats. It should also be noted by the Court Plaintiff was not ever charged with

any trespass before the letters and the properties described in the letters were all properties Plaintiff had reported animal abuse on and cats being killed. Sheriff Doughtie and Deputy Ruth made no effort to stop the cat killing but illegally delivered letters on behalf of the cat killers to intimidate and threaten the Plaintiff as the witness to stop him from reporting more of their crimes or from Plaintiff being able to recover the bodies of his cats to use as evidence. And Deputy Ruth and Sheriff Doughtie willingly cheerfully complied with this obstruction of justice with the illegal serving of the letters. The illegal serving of the letters allowed deputies to enter properties of law abiding citizens with no probable cause and to threaten and confront Plaintiff with no probable cause. And this service is not one available to Plaintiff or other politically opposed members of the community-only those private citizens Sheriff Doughtie find favor with and those recruited for his vendetta against Plaintiff. The properties Plaintiff is responsible for knowing the boundaries of number in the thousands and more that are open to the public but not Plaintiff. Plaintiff has no way of knowing whether or not a property is on the list or if accesses, such as beach accesses, are available for him to use or now restricted for him.

**12. CLAIM: Sheriff Doughtie and Deputy Ruth engaged in acts to illegally imprison plaintiff and prevent his freedom of movement in the community by serving letters that restricted plaintiff's use of public property and right of ways available to all other citizens. They facilitated private citizens to restrict plaintiff with trespass letters to prevent him from using public right of way and accesses. Defendants did this even after being informed of the rights violations and continued to do so to present for the purpose of confining plaintiff to his home.**

**The letters illegally delivered and enforced by Sheriff Doughtie are so broad spectrum that they literally ban plaintiff from leaving his home without committing a false trespass Sheriff Doughtie has continually threatened to enforce. Defendants violated by doing so all of plaintiffs rights to freedom of movement and freedom from false prosecution.**

19. Deputy Ruth even went one step further with his no trespass letters. Deputy Ruth banned Plaintiff from properties that were claimed to be owned by Chris Bock but in fact was not owned by him at all. Plaintiff in an effort to save the Quarter Deck Restaurant cats lured the surviving cats to the Century Link property next door and got permission to feed them and capture them there by the technician who worked there. Deputy Ruth, in an effort to help Chris Bock make the cats suffer, threatened to arrest Plaintiff if he went on the property and fed the cats again for reason Chris Bock claimed to own the property. When Plaintiff contacted Century Link and they verified that they owned the property and not Chris Bock for Deputy Ruth, Deputy Ruth tried to ban Plaintiff from Century Link properties without any justification from anyone. Plaintiff then called the corporate office of Century Link, explained he was rescuing the cats, informed them he was a stockholder in the company and had voting rights which made him an actual owner via his stock, and Century Link gave permission to continue. And the technician verified to the corporate office that the cats were welcome because they kept the mice and rats from chewing through the lines. However, Chris Bock was not satisfied with being wrong and this was when Chris Bock pulled a kitten out from under the front porch of the Quarter Deck, broke it's neck killing it, and left it on the feeding board on the Century Link property for Plaintiff to find then proceeded to continue to illegally kill the

other cats. The picture of the dead kitten is now being used by Deputy Ruth as false evidence for the cyber stalking of Chris Bock. And Deputy Ruth refused to bring charges against Chris Bock for killing the kitten even though Plaintiff witnessed the killing from a distance and immediately found it's dead warm body not a minute after it happened. When Plaintiff filed a sworn affidavit with Deputy Ruth demanding charges be filed, Deputy Ruth responded by e-mail that DA Cruden quote "found no probable cause" and refused to prosecute.

**13. CLAIM: Sheriff Doughtie and Deputy Ruth engaged in and committed multiple acts of animal abuse in violation of the NC Animal Cruelty Act by depriving starving cats of sustenance protected by NC Law. Defendant's acts caused the deaths of multiple cats by starvation and displacement. Defendant's deliberately and maliciously to act against plaintiff made public policy that violates the NC Animal Cruelty Act on behalf of criminals who were killing cats, made policy to cover up their own criminal acts that caused the deaths of cats, creating ordinance for the purpose of obstructing justice, and did so discriminatorily against plaintiff and to cause him debilitating mental pain. Defendants then made this policy, practice, standard of the Dare County Sheriff's Dept.**

20. Nor at any time did Sheriff Doughtie or Deputy Ruth find it animal cruelty to cut off the cats from food and water after Plaintiff had been feeding them for years and the cats were dependent on that food. Sheriff Doughtie and Deputy Ruth's acts were in clear violation of the NC Animal Cruelty Laws, they facilitated with the trespass orders the cats haters attempts to starve the cats and make them suffer, and at no time did they enforce the NC Animal Cruelty Laws on the owners who would be required by law to

take responsibility for the care of the cats on their properties in the absence of Plaintiff's care. Instead Sheriff Doughtie and Deputy Ruth allowed the brutal illegal killings of the cats and provided the cat killers with protection from prosecution. While Plaintiff was forced to suffer watching the killings and the torments shouted by the cat killers who bragged to Plaintiff in vivid detail of the agony the cats suffered as they died. And Plaintiff risked prosecution on several occasions to recover the dead bodies with no one to report the killings to. And their pictures are archived on a facebook page in honor of them that Sheriff Doughtie, Deputy Ruth, and DA Cruden and Bland are desperately trying to have deleted to cover up their negligence in the situation. DA Cruden and Bland are without justification of law trying to claim the photographic evidence of the cat killings, animal cruelty, and complete lack of law enforcement to stop it is cyber stalking the criminals who did it. There is no other way to describe such an abandonment of ethics, morality, or rule of law other than obstruction of justice.

**14. CLAIM: Sheriff Doughtie illegally threatened plaintiff by threat of death to cats then blackmailed plaintiff into rescuing the cats, defendant then made the rescue impossible by setting impossible time and access limitations which resulted in the property owners illegally killing 17 cats when the rescue was not completed in the impossible time frame. Sheriff Doughtie thereby aided and abetted the illegal killings and then obstructed justice to cover up his and the property owners crimes.**

21. Sheriff Doughtie in Feb. 2015 engaged in and facilitated blackmailing Plaintiff's. Approx. Feb. 15th 2015, Chris Bock, called Plaintiff and left a message on his cell phone that if he did not remove the cats from the Quarter Deck's property, Chris Bock

was going to illegally kill them. Chris Bock had been an out spoken cat hater while his wife's family, who allowed the cats to be fed there, owned the restaurant. Now that him and his wife took over the restaurant he ordered Plaintiff to remove them by threat even though Plaintiff never had put them there in the first place. Plaintiff had only found the cats starving and without water there during one winter when they just closed up the restaurant and abandoned the cats living there. In fact it was them who had lured the cats there throwing them scraps for a decade before Plaintiff ever moved to that area. So Plaintiff found the cats suffering from animal cruelty and stepped in to stop it by providing food, water, and medicine and began an effort to find them a better place to live. And Plaintiff got stuck caring for the cats for years. After the Bock's took over they capitalized on their own animal cruelty and negligence and blackmailed Plaintiff into taking the cats to his own home and making Plaintiff spend his own money to remove the cats from their property. Even though Plaintiff had no hand in them being there in the first place. The only legal means for the Bock's to remove the cats was to have the Dare SPCA give them traps and the Bocks would have to trap them themselves and be responsible for the care of the cats until the SPCA collected them. But the Bock's had no intention of spending their own time and money for an animal they hated. They simply called up the Plaintiff and threaten to kill them then watch Plaintiff scramble to save their lives at no cost or effort to them. And that is exactly what they did. When Plaintiff objected to the unreasonableness of the request they immediately tried to cut the cats off from their food and water, an act in violation of the NC Animal Cruelty Law, and let them starve to death. This is when Sheriff Doughtie and Deputy Ruth stepped in and threatened Plaintiff, claiming the cats were a trespass and Plaintiff responsible for

the removal of them. So Plaintiff was forced to comply with the blackmail and then scrambled desperately to prepare his home for the cats. Something not even physically or economically possible in the time frame given or without any help. When Plaintiff tried to get help from outside animal advocate sources, Sheriff Doughtie was caught providing false information about Plaintiff, such as the ridiculous fabrication that Plaintiff was asking for a helicopter to rescue the cats, in order to undermine Plaintiff's character and sanity to discourage outside groups from helping. And Sheriff Doughtie's slanders, using the legal authority of his office, worked and Plaintiff was forced to suffer the rescue alone and with little money. This blackmail cost Plaintiff approx. \$20,000.00 to construct his rescue compound and when Chris Bock saw that Plaintiff was succeeding with the rescue, having lured the cats to the Century Link property despite Bock's efforts to block their rescue, Bock killed 17 of the 26 cats. Only eight were rescued and the 9th is still at large who knows where if he survived at all.

**15. CLAIM: Sheriff Doughtie altered and deleted evidence of speeding, reckless driving, and most importantly the deliberate running down and killing of animals crossing the street in front of plaintiff's home for the purpose of obstructing justice, denying plaintiff Equal Protection Of Law, and to torment plaintiff who was tasked with removing the dead animals, documenting the illegal run downs, and giving first aid and the only available aid to the injured but still alive animals who had been deliberately run down as part of Sheriff Doughtie's and his political supporters gang stalking rituals.**

22. Sheriff Doughtie altered or deleted evidence of speeding in front of Plaintiff's home then provided false information to the Dare County Board to have Plaintiff's and his

families request for the speed limit to be reduced in front of their home denied by the Board. It is clear in previous items that Plaintiff documented and removed 4020 animals deliberately and negligently run over in front of his home over a 10 year period. After it was obvious that Sheriff Doughtie was not going to enforce the speed limit or try and catch the people deliberately running over them, Plaintiff tried to have the speed limit reduced to 35 mph full time. And Plaintiff and Christine Hutten, who also lives there, complained to the NC Hwy Patrol on several occasions. In response Sheriff Doughtie had a speed limit camera set up. The first time Plaintiff and his family counted during the day regularly at different times approx. 100 people photographed speeding per half an hour. It was put up on a Saturday at noon and by Sunday morning the battery was dead from taking so many pictures. The second time the cameras were put up in both directions Plaintiff and his family counted at multiple different times the cameras taking about 100 pictures per hour in both directions. Plaintiff's believed this was the end of the speeding problem and the speed limit would have to be reduced. However, Sheriff Doughtie appeared before the Dare County Board at their request and stated in response to Plaintiff's letter, quote " they had found no speeding problem in that area". And Plaintiff's request was denied and the deliberate animal run downs and excessive speeding went on and is still going on today. When NC Hwy Patrol does radar in front of our house they average about 1 ticket every 10-15 minutes for the 2 hours they monitor. Sometimes during summer one right after the other until they leave the area. The Dare County Sheriff's Dept. sits there and writes no tickets to anyone even if they speed and we have video of them just sitting in plain view doing nothing in spite of the 4020 photographs of the animals hit here. It is clear Sheriff Doughtie is faking law



enforcement to try and cover up his violations of rights. It cannot be over looked the contrast in the tickets written by NC Hwy Patrol verses the ones written by the Sheriff's Dept.

23. Plaintiff, witnessed on many many occasions, that locals he knew who drank to well over the limit of alcohol consumption to drive, had somebody informing them by cell phone when the road was clear of sheriff's deputies or Hwy Patrol. Someone inside the Sheriff's Dept., who were friends with these people drunk driving, were informing them when they could drunk drive home. These drunken drivers were not happy just driving home drunk and getting away with it-they would drive home at speeds 80-100 mph in a drunken NASCAR race at 2:00 am in the morning sometimes drafting one another right on each others bumpers. Plaintiff witnessed this almost every night and witnessed these drunk drivers literally plowing over animals and his cats on the street. Plaintiff reported this to Sheriff Doughtie who ignored it. Plaintiff documented the nightly drunken NASCAR race with calls for non-emergency police service to the Dare County Sheriff's Dept. and in some instances when near death or deaths had occurred to animals or near collision with other drivers with 911 calls so that by chance someone was killed by their negligence to stop it the victims would have a recording of the event. To this day the deadly race still occurs with no action by Sheriff Doughtie to stop it or effort we know of to catch the informant who is facilitating it. Even now we still witness them driving by at high speed at closing time for the bars.

**16. CLAIM: Plaintiff makes a Constitutional Challenge of the Dare County District Attorney's and NC's application and wording of the NC Cyber Stalking Law.**

24. Plaintiff does challenge the constitutionality of the NC Cyber Stalking Law 14-196.3

While not all speech is free the constitutionality of the law is flawed- victims and witnesses to any crimes should have unrestricted freedom to speak about their experience in any electronic forum. They should have unrestricted freedom to name their abuser, attacker, or person of interest in any manner in which they choose including social media or any other electronic forum. Whether the criminal get charged or not. Any criminal act against another person becomes a part of the life and history of that person and they should possess unwaivering freedom of speech to speak about their experiences and lives. No other freedom could be more important in a just society. And that victim or witnesses experiences should not be deemed false should they be mistaken or unproven. In a just society where victims and witnesses are urged to assist in keeping the community safe by assisting in the identification of criminal acts or person of interest there can be no penalty for abiding by this urgent request. To inhibit coming forward would be to assist in the criminal behavior and an obstruction to justice. While NC's cyber stalking law allows for an exemption for "providing lawful information to other" and lightly addresses an exemption for freedom of speech, it does not address and exempt those who are victims and witnesses who wish to speak, publish, or distribute information about the crimes committed against them or that they witnessed. Additionally, section b(2) does not specifically state the "repeated communication" has to go to the person being stalked to be considered a stalking. It implies unconstitutionally that 2 or more statements to "another" could be to some person other than the stalking victim and that a person could be stalked in third person by the author simply communicating with any other person things that some person not being communicated with might find objectionable. And this flawed wording leaves the door

open for any discussion in public or private , without ever communicating to the person being spoken about, to be considered a crime or a repeated communication. Civil standards for liable would be more stringent than that for a criminal communication. And again, b(2) does not exempt victims and witnesses where they may be compelled or need to communicate 2 or more times to assert their own safety or legal position. This Court needs to rule on the proper constitutional application of this law and demand a revision in it's language.

**17. CLAIM: Sheriff Doughtie and Deputy Ruth then double down and commit again their threats and blackmailing of plaintiff with threats to kill other homeless cats in plaintiff's neighborhood that plaintiff was providing humanitarian support of to keep them from suffering acts of animal cruelty. And both defendants did so while obstructing justice for the killing of those cats and while protecting the wealthy white cat killers. It was an attempt to coral the cats at plaintiffs home, cause him to fail financially in their care, then label plaintiff a hoarder and prosecute him while covering up the cat killings and the fact they ordered plaintiff with threat of arrest for the trespass of the cat in the neighborhood to take the cats to plaintiff's home, the only place available to take them. Defendant's maliciously conspired to kill the cats at plaintiffs home and cause plaintiff the irreparable mental anguish of labeling him an animal abuser. Meanwhile defendants continued to gang stalk plaintiff and their political supporters continued to gang stalk plaintiff and kill the cats for political revenge.**

25. Sheriff Doughtie's success in his illegal blackmail of Plaintiff of the Quarter Deck cats prompted him to do yet another blackmail to get Plaintiff to remove the cats of

Ships Timbers Road in Frisco NC. Only this time Sheriff Doughtie committed the blackmail backed by the Dare County Sheriff's Dept. on sheriff's dept. letter head. He made a direct demand in writing on sheriff's dept. letter head for Plaintiff to remove the cats from Ships Timbers Road or suffer a trespass charge. The letter reads "remove all property associated with the cats to include any cats"..., "you are subject to arrest or criminal prosecution. Letter dated Jan. 4, 2015 signed by Deputy Ruth but the actual date was Jan. 4 2016. Again, no consideration was given to the fact Plaintiff did not put the cats there or any inquire into what cat property was Plaintiffs or been put there by other person's interested in helping the cats. AND absolutely no consideration was given to what would happen to the cats once their food and water was removed permanently should Plaintiff not be able to remove them or if cutting them off from any source of sustenance on behalf of the cat hating owners would be an act of animal cruelty in violation of the NC Animal Cruelty Law. But Sheriff Doughtie enforced it anyway with blatant disregard for the well being and safety of the cats and claimed that the sheriff's dept. was acting as the legal agent of the homeowners there. And while he acted he claimed to have unanimous consent of the homeowners there but in fact he did not. One homeowner was not agreeing to the victimization of the cats. Due to Sheriff Doughtie's negligent unconstitutional disregard for the cats well being an elderly cat named Squeeky was starved to death. Another cat named Lion, who was tame enough to be homed was killed by the homeowner adjacent to the court named John Guido. This was all after Sheriff Doughtie falsified evidence and obstructed justice in the killing of 4 other cats by this homeowner. This homeowner, a known cat hater, was seen by Plaintiff putting out industrial strength chlorine for the cats to drink yet no effort was

made to stop him by law enforcement. One of the cats who drank the poison and died, Dandelion, was found by Plaintiff and turned over to Sheriff Doughtie for an autopsy. Sheriff Doughtie never gave Plaintiff the autopsy report for his cat but claimed over the phone the result was "inconclusive" which was false. A lie Sheriff Doughtie told to protect John Guido from prosecution and to torment Plaintiff. The autopsy report says the toxicology was inconclusive but also states the cat did not die from natural causes. Inconclusive toxicology means they either could not identify the poison for lack of body fluid or that the amount available after time had passed was no longer in the amount that could be determined toxic. HOWEVER, the report, according to the VET who did the autopsy does state that the esophagus was burned with a chemical substance and the stomach lining had similar damage. And this would render the cat unable to eat and consistent with drinking concentrated chlorine, a known poison cats like like catnip and is untraceable in most cases. A preferred poison of cat haters to anti-freeze for it's inability to show up on autopsies and the exact substance John Guido had sitting in his driveway. To add to the verifiability of this evidence a possum had also gotten the poison and died a day later at the end of John Guido's driveway in a closed court with no traffic. Plaintiff made a call for police to collect the body of the possum and do an autopsy. The responding deputy, Deputy Stowe, refused to collect the possums body as evidence. A picture was taken of the dead possum where it died by Plaintiff. And Sheriff Doughtie was contacted by e-mail and refused to act on the request. In all 4 cats died as a result of the obstruction of justice-Dandelion, Forsythia, Bob, and Tiger Kitty.

26. Unknown to Plaintiff in Jan. 2016 during this blackmail with the Ships Timber's cats. Sheriff Doughtie had allowed Deputy Ruth, a deputy with no law writing or animal

advocacy experience, to write a feeding ordinance to regulate the feeding of homeless cats. No cat advocate groups would have come up with such an unconstitutional ordinance which in effect banned anyone from feeding cats and violated the NC Animal Cruelty Law. One unconstitutional aspect of the ordinance require a person giving food to the cat is that they must get written permission from all owners within 300 yards of a property where you have permission to feed. This gives a neighbor the right to ban a legal legitimate activity from a property they do not own based on their whims or dislike of cats in general. This requires a cat caretaker who is supplying life saving sustenance to obtain signatures from other owners who may not want an unknown person to have their signature-a mostly impossible task. And if the permission cannot be obtained then the cats simply starve and die-a violation of the NC Animal Cruelty Law of abandonment and depriving of sustenance. The ordinance makes no exception for cats that are already being fed and are dependent on food or are unable to find food on their own (a common misconception is that just because you call them feral they can survive and find food) or that a food source other than the caretaker even exists. This county ordinance literally makes a stipulation that forces a law abiding person giving humanitarian aid to an already abandoned cat to commit an act of animal cruelty in violation of the NC Animal Cruelty Law. And the ordinance makes no exception for cats that already live on the property. Or an exception to protect the life of the cat. It is an ignorant ordinance that assumes a cat can exist without food and water. It also directs the caretaker to remove the food and water after feeding. Cats need water 24/7 just like your dog especially in the summer heat. The ordinance again directs the caretaker to commit an act of animal cruelty and go against any VETs advice to keep water available

at all times. The ordinance, written by Deputy Ruth, purpose is to criminalize taking care of these homeless cats in an unconstitutional way and making it impossible for anyone to care for them. The ordinance, rather than being written with the well being of the cats in mind, was written by Deputy Ruth and sanctioned by Sheriff Doughtie to make it impossible to feed the cats at all. And they specifically directed their efforts at Plaintiff to criminalize what Plaintiff was doing for the cats to save them. And they had hoped Plaintiff would refuse to abide by it and they would have their revenge with an arrest. If this seems implausible a review of the video of the passing of the ordinance by the Dare County Board shows the appearance of John and Kelly Guido, the cat killers from Ships Timbers, gushingly thanking Sheriff Doughtie for the ordinance they requested and no animal advocates there in opposition. Why? The Board supplies the reasoning in the video when they state quote " no public hearing has taken place yet but we will go ahead and pass it anyway and we can add to it later". Making the passing of the ordinance a constitutional violation. This was the Boards response after hearing only testimony by the Guidos, who are not even residents of Dare County but rental property owners, after the Guidos thoroughly slandered Plaintiff in public with false statements at a hearing about Plaintiff who was not afforded the right to attend the hearing and defend himself from his accusers. Another violation of constitutional rights. Nor was any other citizen of Dare County informed of what the Board was about to do against the cat caretakers on behalf of these cat killers who do not actually reside in Dare County. This was is known as an illegal back room deal made by the Board for a sheriff to cover his negligence and obstruction of justice in response to Plaintiff exposing the animal cruelty to the homeless cats.

**18. CLAIM: Deputy Ruth with the consent of Sheriff Doughtie then tried to use the Dare County Cat Ordinance to do illegal searches and seizures on plaintiff's property in violation of his constitutional right against those, and them and the Dare County SPCA, an illegal animal advocate 501C3 that creates a false impression of animal advocacy on behalf of Dare County who have animal control contracts with Dare County but despite their false presentation to the public act as animal exterminators, discriminatorily targeted plaintiff and no other similarly situated persons for the illegal searches as part of the conspiracy to blackmail plaintiff into bringing the cats to his home and then moving in to prosecute him for doing so.**

27. Then after the illegal passing of the cat feeding ordinance without public consent or discussion Deputy Ruth added language to give himself illegal unconstitutional rights of search of any fenced property with a cat colony on it. And gave the Dare SPCA an additional right to search fenced properties at any time they gave notice to a homeowner under the feeding ordinance. Without due process of law and in violation of a persons right to unreasonable illegal search and seizure in complete violation of the US Constitution with absolutely no probable cause needed. Deputy Ruth overrode the Constitution with his own version of law and did so without legislative procedure of any kind or public consent or due process of law. That makes Deputy Ruth and Sheriff Doughtie responsible for the damages to every individual who is adversely affected by their illegal law. This addendum to the ordinance was put their by Deputy Ruth in response to Plaintiff's having succeeded in rescuing the cats at gunpoint by their blackmail and now Deputy Ruth was creating law so he could force his way onto



Plaintiff's property to look for more ways to abuse him. Plaintiff was forced to hire an attorney to assert his rights to prevent Deputy Ruth and the SPCA from an illegal search of his property. The Dare County Board in 2019 still has not advertised the public or had any public hearing on the ordinance as it stands. They simply make the laws regardless of our opinions then enforce them on whoever they wish to target without anyone knowing there was even a law made in the first place. Together the Dare Board with Sheriff Doughtie and a compliant District Attorney, DA Cruden and District Judges who adhere to no rule of law, run a KKK style dictatorship that railroads targeted individuals for their political views and abuses the court and legislative system at their whim.

**19. CLAIM: Deputy Ruth with the consent of Sheriff Doughtie then initiated a KKK style Gang Stalking by recruiting members of the community and the neighborhood where the cats previously lived to commit acts against plaintiff to cause him distress and make him abandon his residence. Deputy Ruth provided false illegal information to rally a homeowners association with many members to attack plaintiff. And Deputy Ruth's efforts culminated in the bombing of plaintiff's home and the illegal execution and murder of several of plaintiff's cats.**

28. But Deputy Ruth's Gang Stalking style abuse did not end there. He then targeted the innocent cats of Runboat Circle in the Hatterasman subdivision. The Hatterasman Homeowners association originally poled their owners about the feeding of the cats that have been there for years before Plaintiff ever moved here, and of the 50 homeowners, only 10 signed the no trespass letter against Plaintiff being in the neighborhood to feed the cats. That meant 40 were unopposed to the cats being fed by Plaintiff. However, even without a majority, Plaintiff was banned from the public right of

way, open to all other members of the public, and the public beach access, also open to all other members of the public. And this also banned Plaintiff's family, known associates, or anyone affiliated with Plaintiff in any way. Being Plaintiff lived directly across the street this meant Plaintiff or anyone he had at his house were not allowed to use "their beach" which is really the National Park by them blocking his access illegally. And this order from them was delivered by Sheriff Doughtie with the full weight of the Sheriff's Dept. who now assumes responsibility for the constitutional violations and discrimination initiated by the homeowners association. This was done to Plaintiff even though the beach he is banned and blocked from using is his ancestral lands and the place Plaintiff and his family grew up. Plaintiff's family had made sure in the charter when they donated the land to the National Park Service that no one, especially not a future generation, would be blocked from using the beach by those controlling public right of ways. Nor did the Hatterasman Homeowners Association or Sheriff Doughtie have jurisdiction to deprive Plaintiff of the use of the federal beach. But they did it anyway. But Deputy Ruth could not accept or live with the fact Plaintiff still had homeowners allowing him to feed the cats or that those cats were still able to live without starving. Deputy Ruth decided to attend a homeowners association meeting himself so he could slander Plaintiff to the owners with a 27 year old conviction in Virginia Plaintiff denies ever doing. A conviction Plaintiff found exculpatory evidence to and had an actual innocence clemency petition on Gov. Gilmore's desk. But according to homeowners who attended the meeting Ruth left out the actual facts and used his own version to scare owners into signing a new trespass order to further ban Plaintiff from their neighborhood. His depiction of Plaintiff was that Plaintiff posed a serious threat to

anyone he encountered without Plaintiff ever having done anything to deserve the description. Including the act that happened over a quarter century ago-an act of self defense. After Deputy Ruth's attendance of the meeting a new no trespass order was served on Plaintiff by Deputy Ruth with now 40 of the 50 homeowners against Plaintiff and now Plaintiff is completely banned from this public neighborhood and the public federal beach without ever having done anything to anyone. Just for feeding homeless cats and reporting the animal cruelty Plaintiff witnessed there. Those cats starved to death due to Deputy Ruth's manipulation of the situation. And Plaintiff is still unconsolable over their deaths. A few months later Plaintiff began receiving death threat notes from owners there and this is what prompted them to bomb Plaintiff's home and cat rescue compound with complete immunity from prosecution. Deputy Ruth's message to them was sign my order and it is open season on Mr. Felix and this is how it was relayed to me by the few homeowners who refused to sign it who have known me over the years.

29. But Deputy Ruth was not finished. The Bocks had bought the lot directly across from the Quarter Deck where another group of cats lived and he came at me again with a trespass order and a blackmail to take away that group of cats. And Plaintiff complied to save the cats from them being killed and starved. In all Plaintiff was blackmailed into rescuing all the cats in the neighborhood who survived the animal cruelty and not one person was charged with killing the cats. Even though 60 had died in that neighborhood before and during the rescue. And several others by now have surely starved due to Deputy Ruth's and Sheriff Doughtie's forcing Plaintiff to abandon them and leave them without food. Even after Plaintiff pleaded with them to give them food or bring them to

here to safety Sheriff Doughtie and Deputy Ruth refused wanting them to die horrible deaths. In march , 2 cats were shot three doors down by a gun illegally fired in a residential neighborhood,which Plaintiff reported to the animal cruelty hotline on the NC Attorney General's website, they refused to investigate or take any action. Now 2 other have gone back into the neighborhood and never come back.And Plaintiff is blocked by trespass orders from retrieving his cats. No effort has been made by Sheriff Doughtie or Deputy Ruth to afford Plaintiff any rights, protection of law,or even common decency.

30. There is no Sovereign or Government Immunity for these the acts enclosed-these authorities,all trained and licensed in the laws, they acted outside their duties to harm Plaintiff and acted personally to inflict harm to Plaintiff. And the State and local municipality were informed of their unlawful acts and refused to correct them. They do not enjoy "qualified immunity" because as qualified law professionals,trained in the laws, they would have known or should have known their acts were unlawful and a violation of Plaintiffs rights. No reasonable person would suggest the enclosed acts would be outside the knowledge of these kinds of authorities. To drive home the point,Plaintiff made sure they knew of their unlawful acts in writing by informing them before,during and after their acts were committed. Plaintiff informed each of them of the details and violations and requested it be corrected but each time they came up with new ways to violate Plaintiff's rights and abuse him in new ways and committed additional acts to cover up their unlawful behavior. No Defendant can claim ignorance to the acts listed in this complaint or that they were unlawful.The NC Tort Claim Act waives immunity under the conditions and acts listed. The Public Duty Doctrine does not apply because because these defendants directly acted to cause Plaintiff harm and provoked

acts against Plaintiff by third parties making them direct conspirators in the third party acts to harm Plaintiff. Thus Plaintiff files in good faith because he believes no immunity can arise as a defense. Additionally, Plaintiff has not first asked for monetary damages, he has asked the Court to stop the Constitutional violations and repair the damages of the constitutional deprivations and to correct them so they do not occur again to Plaintiff or others in the future. Plaintiff has left it up to the Court to decide if some other form of compensation is warranted after the restoration of Plaintiffs rights and the offending parties are punished.

31. Any argument of the statutes of limitation would be equally meritless due to the fact this is an ongoing rights violations assault to deprive Plaintiff of his equal protection of law, his freedom of speech, and an obstruction of justice. Let the Court be on notice that the constitutional violations are still ongoing. That the subject and initial purpose of the lawsuit is to stop the rights violation assault and restore those rights via Court order. This cannot be overcome by a statute of limitation claim and nor can a tort claim limitation begin until the acts and damage from those acts stops. Nothing drives home this point like Sheriff Doughtie's and the Dare County Sheriff's Dept. ban of Plaintiff and members of his household using the 911 service. On July 3rd, 2017 in response to the bombing of Plaintiff's and Christine Hutten's home and cat rescue compound an unnamed sheriff's deputy stated, threatened, that if Plaintiff or anyone else living in the home called 911 again and the deputy felt it was not an emergency, Plaintiff would be arrested. Considering that this was in response to their 911 call after a commercial grade rocket, bomb, was launched into their fenced property that had the explosive killing force of a stick of dynamite, what could possibly be considered an emergency if

this act was not. They were saying with this threat that nothing would be considered by the Dare County Sheriff's Dept. an emergency and if we called 911 at all we'd be arrested. This means to date Plaintiff and his family are without the right to 911 services. Plaintiff and his family have in effect no police service, no fire service, no ambulance service. And this deprivation of police protection has been well distributed to the community of gang stalkers who assault Plaintiff and his family at his home knowing they will not be questioned or caught by police and with DA Cruden and Bland's blessing who will not prosecute them. Plaintiff is still in possession of a death threat notes and video of the gang stalkers stalking Plaintiff with no one to turn them over to who will actually prosecute. A clear and concise ongoing violation of rights unabated by the time it has been happening.

32. NC Governor Roy Cooper was forwarded almost every e-mail to Sheriff Doughtie and Deputy Ruth detailing the crimes committed and rights violations but took no action to stop them or the abuse. Gov. Cooper as a former NC Attorney General would certainly "know" or should have known these were rights violations and serious crimes being ignored by Sheriff Doughtie that placed Plaintiff and his family in danger and the general public. Gov. Cooper's aids, who received the e-mails and spoke with Plaintiff many times on the phone, Teresa Clawson and another aid whose name is now unavailable, told Plaintiff that Gov. Cooper was aware of the situation but claimed to have no available remedy to him to stop the situation. And this is patently false. The Governor had the authority to correct the situation but simply refused knowing the damages and the abuse that would occur.

33. The Court is well aware of the concept of "deliberate negligence". This is when

someone conspires to act with negligence to cause harm and hide their actions with the claim of ignorance or accidental negligence. Here the petition is rife with deliberate negligence in order to harm Plaintiff. These people did and are still doing acts to harm Plaintiff, purposefully not doing their duty to uphold the law, and doing so under the guise of immunity, authoritative discretion, or pretending to not see the abuses happening to Plaintiff. A well known tactic of people who conspire to abuse their power- a concept we call corruption. An example of such a concept is Sheriff Doughtie, Deputy Ruth, and others in the Dare County Sheriff's Dept. deliberately avoiding evidence of crimes Plaintiff was reporting in order to discredit Plaintiff then falsifying police reports on literally hundreds of occasions in order to discredit Plaintiff and deny him justice. This discrepancy can be made evident by comparing the notes typed by the dispatch operators and 911 recording verses the findings of the responding deputies on their police reports. Nothing drives home this point better than all the many calls for police service where poison was found by Plaintiff left out for the homeless cats and Deputy Stowe refusing to photograph and collect the evidence. Forcing Plaintiff to collect the toxic substances, which could have been deadly to humans also, and hold them for prosecutions that were never going to take place anyway. Or more recently the drug dealers Kevin Morris and Chris Bock and their friends, caught on video, coming to Plaintiff's home to stalk and threaten Plaintiff during literally hundreds of times, while the Dare County Sheriff's Dept. pretends to not be able to stop it or catch the criminals. Deliberately avoiding evidence to torment Plaintiff and deny him justice. Again, the public record is rife with other examples of this conduct, too numerous to list at this time, but makes it abundantly clear this was not a few innocent acts of oversight but an

ongoing conspiracy to deny Plaintiff his rights and abuse him personally with their powers. And Gov. Cooper and before that Gov. Mc Crory were both kept apprised of this ongoing conspiracy by law enforcement as well as all the other acts happening. Sheriff Doughtie's and Deputy Ruth's contacts with the Dare County Attorney, the District Attorney's Office, or any other legal entity to find out how to abuse Plaintiff legally rather than to protect Plaintiff should be considered them educating themselves in how to be negligent and abusive with their power and have legal immunity. The contrast of their actions to do abusive things to Plaintiff with legal justification and not take action to prevent Plaintiff harm or abuse is overwhelming to this point.

34. Plaintiff is aware of the need to supply the Court with the "who, what, why, when, where" of the incidents but the Court needs to take note that the defendants are all public authorities and can and will abuse their "authoritative privileges" to deny Plaintiff that information and cover up their illegal and unconstitutional acts. All of these defendants have thorough knowledge of how to do this and to dispose of evidence using the system they represent. Especially Sheriff Doughtie, who disposed of evidence in a prior case before this Court, the Patterson case against him and the Dare County Jail, in order to avoid liability for this persons permanent brain damage-that Plaintiff lost his complaint as a result of this obstruction of justice. Here Plaintiff requests the Court to order the preservation of all documents and evidence in all of their departments until discovery and the lawsuit is over and if possible recover any of it that has already been disposed of. The Court should consider any action to dispose of evidence or documents from the time this lawsuit is filed to be part of the ongoing acts to obstruct justice. The Court should consider this notification to all



defendants that no documents should be disposed of in any respect until it can be determined through discovery they are irrelevant to this case.

**20. NC Attorney General Josh Stein denied plaintiff Equal Protection Of Law by not pursuing,investigating and not prosecuting affluent members of the community who committed fraud against plaintiff in violation of NC Law and not protecting other members of the public who were similarly defrauded and not protecting the public from future fraud that is still ongoing by these criminals.**

35. NC Attorney General Josh Stein denied plaintiff equal protection of law,obstructed justice, and violated his duty to the public when he responded to plaintiff's request for a criminal investigation and prosecution of the real estate agents who defrauded plaintiff and Christine Hutten out of \$68,000.00 dollars of their life's savings. Plaintiff notified NC Att. Gen. Stein of the fraud and details of the fraud in an official request for a prosecution. Plaintiff detailed that Danny Couch, acting as plaintiff's real estate agent, and Dan Johnson of Midget Realty, acting as the sellers agent colluded to present false information to plaintiff and Christine Hutten to have them purchase real estate at a fraudulent price. Dan Johnson stated that the larger lot adjacent to the lot being purchased had sold for \$165,000.00 which was absolutely false. The lot had sold for \$132,500.00 just 60 days prior. And Danny Couch,plaintiff's agent who was supposed to protect them, validated this lie so that plaintiff and Ms. Hutten would bid an unprecedented \$32,500.00 more than what the larger lot actually sold for. Then both real estate agents in collusion doubled down on the fraud and wanted another \$10,000.00 dollars for the fraudulent lot but plaintiffs were only able to provide another \$5,000.00. The result was these two real estate agents colluding together sold plaintiff

and Ms. Hutten a smaller lot for \$170,000.00 with a lie that the larger lot had sold for \$165,000.00 just 60 days prior. Plaintiff and M. Hutten were defrauded out of approx. \$37,500.00 by these 2 real estate agents acting together to provide false information to the buyer. To add to plaintiff's point about the existence of the KKK style government the local Real Estate Appraisers allow Midgett Realty to dictate real estate values to the appraisers who duty it is to protect the public. Here Dan Johnson demanded the value of the smaller lot be appraised at \$185,000.00, making the appraiser a coconspirator in the fraud, which the appraiser did and this kept plaintiff and Ms. Hutten in the dark about the fraud that had just happened to them. With larger lot actually selling at \$132,000.00 just 60 days prior such an increase is impossible showing the collusion between the real estate agents and the appraiser to defrauding plaintiff and Ms. Hutten out of their life's savings. Dan Johnson promptly put the larger lot up for sale at \$195,000.00 continuing to benefit from the fraud knowing full well that the appraisers would back up any pricing fraud he was committing. Then Dan Johnson approached plaintiff again stating the owner of the larger lot would sell it to plaintiff for what he paid for it \$165,000.00 and plaintiff and Ms. Hutten still under the belief in the lie bought that lot for \$32,500.00 more than was actually paid for it. In total Dan Johnson and Danny Couch's lie with the help of a complicit appraiser defrauded plaintiff and Ms. Hutten out of \$70,000.00 dollars of their life's savings. And this real estate and appraisal fraud was/is happening still. The Midgetts, who pride themselves on running Hatteras Island in the KKK style mobster like manner, control the real estate appraisers and other authorities on Hatteras Island. And these real estate appraisers, rather than doing their job which is to protect the public, defer their public duty by threat from the Midgetts, without any means

to defy them. Defying them would mean they too would be run off the island or would be outed for the rest of the time they lived on the island. This racketeering, as it is criminally known, allowed for decades of persons to be defrauded out of their money in these type fraudulent real estate sales. Again, when plaintiff found out he had been defrauded out of his money he contacted NC Att. Gen. Stein specifically and asked for a prosecution. Plaintiff received a letter from Adrienna Glover, RE: File No. 1903577 Midgett Realty dated May 2nd 2019 from NC Att. Gen. Stein's office transferring plaintiff's complaint to the NC Real Estate Commission who has no jurisdiction over a criminal prosecution. Then when plaintiff contacted NC Att. Gen. Stein again about the matter again and demanded a criminal prosecution NC Att. Gen. Stein sent plaintiff an e-mail with his name on it dated July 17th 2019 referring him back to the corrupt sheriff and district attorney's office plaintiff had also complained about. This confirms NC Att. Gen. Stein knew about the fraud,knew about the KKK style government and corruption,and the gang stalking of plaintiff and his family but refused to do his duty, as dictated by his oath of office,on behalf of plaintiff or the public. This made NC Att. Gen. Stein an accessory to the fraud and gang stalking with his obstruction of justice in the matters. NC Att. Gen. Stein has denied plaintiff "Equal Protection Of Law" and assisted the criminals in other civil rights violations.

**21. CLAIM: District Attorney Womble, DAS Cruden and Bland, Sheriff Doughtie and NC Attorney General Stein committed obstruction of justice, aided and abetted fraud, and violated their oaths of office and duties to the public for covering up the fraud against plaintiff and the public committed by one of their wealthy white protected drug dealers. They aided and abetted the laundering of**

**drug money and facilitated drug sales and drug trafficking while protecting an illegal business that was defrauding the public.**

36. NC Attorney General Stein, District Attorney's Womble, Cruden and Bland, and Sheriff Doughtie defied their duties to the public, obstructed justice and committed accessory to fraud against the public by protecting Kevin Morris and covering up his fraud as a swimming pool contractor. Kevin Morris has been advertising he is a swimming pool contractor in the public phone book and several local newspapers for over 20 years. But in fact he never had a Contractor's License in NC. Something that should have been investigated and prosecuted by any and all of the defendants. While unincorporated villages in Dare County allow for unlicensed contractors to do contracts up to \$30,000.00 without a license, they consider the building permits and contracts for a swimming pool to include the deck and fence as one contract by law. And it is impossible to build a swimming pool, deck, and fence for under \$30,000.00. Kevin Morris after advertising he was a swimming pool contractor would refer his customers to a licensed contractor or have the homeowner obtain the building permits for him. This creates fraud on multiple levels, it transfers liability to an unsuspecting unknowing homeowner, and releases Kevin Morris from any liability while the whole time fraudulently portraying himself as a contractor. And Kevin Morris has committed this fraud hundreds of times over. All of the above defendants have the legal knowledge to know these unsuspecting homeowners, by signing for the building permits themselves, after hiring what they thought was a licensed swimming pool contractor, take full responsibility for anything that happens during construction or for any injuries that result from the product even after it is sold to a consecutive owner because they have in fact

been defrauded into taking that liability by obtaining building permits without being first informed of the risks. This is a complete side step to the protections the contractor licensing system is set up to afford to unknowing homeowners and a fraud being committed against the public. And Kevin Morris does this with the protection of the above defendants without any fear of prosecution among other illegal things he regularly does. How do the above defendants justify Kevin Morris spending over 20 years building pools and advertising himself as a contractor but never actually getting a NC Contractors License? Kevin Morris has immunized himself from any liability from injury of the product he creates or his workmanship and transferred that to an unsuspecting homeowner or had the homeowner hire a licensed contractor who takes responsibility but at a greatly inflated price to the homeowner that a real licensed swimming pool contractor would assume for the regular cost of the pools installation. All the while Kevin Morris gets all the money and takes none of the risk that a licensed swimming pool contractor takes. And likewise the homeowner, due to this fraud, gets no protection from the contractor recovery fund set up by the state, should the homeowner need to sue for a failure to complete the contract. It is a fraud, an advertised fraud, from start to finish and these defendants are not only accommodating this fraud they are helping him get away with it and keeping plaintiff from exposing the fraud for the public's protection.

37. Another issue that drives home the point of the KKK style government is that plaintiff knows personally a parole/probation officer who is also protecting the drug dealers and affluent drug users. Probation Officer Ralph Umphlet was known to sell marijuana during and after high school to kids as young as 7th grade. He grew up with plaintiff on

Hatteras Island and knows the same drug users and drug dealers that plaintiff knows but has kept their secrets. This is a violation of his oath of office and public duty. Worse Umphlet's mother , who served on the Dare County Board Of Commissioners, is a Midgett and is related to the same drug addicts plaintiff is trying to expose and she knows all their drug habits but has made no effort to inform law enforcement to protect the public-a violation of her duties and oath while she sat on the Board. These are the same drug addicts buying drugs from Kevin Morris that plaintiff was set to expose. It is a blaring indication that there is a separate law and standard for the connected persons and the corrupt authorities such as these protect them from prosecution. It is also an indication of the KKK style government by having Ralph Umphlet and other Deputies in the Dare County Sheriff's Dept. know of the drug use and drug dealings of their friends and relatives but only enforce the law on other persons. It is their duty to act as law enforcement to protect the public from illegal drugs regardless of who is involved. Here you have the persons making the arrests, the persons prosecuting, and the persons providing after sentencing monitoring all conspiring to providing immunity to the very persons selling and importing the drugs and their affluent clients while presenting a front as law enforcement to the unsuspecting public. They are literally prosecuting the persons caught with the drugs while protecting the persons who sell the drugs and bring them here. What a contradiction to their duty and oaths of office. Likewise, Danny Couch, who now sits on the Dare County Board Of Commissioners has intimate knowledge like plaintiff of the drug habits, drug dealings, and other illegal acts plaguing the area but is keeping them secret in the KKK style manner. And there are other affluent members of the community that plaintiff knows of who enjoy this immunity from

prosecution and drug lifestyle

**22. CLAIM: Sheriff Doughtie, Deputy Ruth, District Attorney Womble, DAs Cruden and Bland along with two local judges, the Dare County Attorney and several of the Dare county Board of Commissioners have run and are still running a KKK Style Government where any complaints about any of them fall within the jurisdiction of their friends in government. And they abuse their power and discretion to their political ends with the full knowledge no complaint will be investigated or acted upon. Plaintiff was repeatedly the victim of their abuse of power due to his political views and political affiliations that were contrary to their KKK Style rule over the county. And they openly committed rights violations, obstruction of justice, and illegal discriminations with no correcting the acts possible.**

38. None of the felonies that victimized plaintiff or that he is witness to have any statute of limitations in NC. Plaintiff is being blocked from "Equal Protection Of Law" by the KKK style government established by Sheriff Doughtie, the Dare County Sheriff's Dept., and District Attorney's Womble, Cruden and Bland. Detailed in the complaint and the amendment are multiple felonies that any normal sheriff or district attorney would act on on behalf of the victim and the public. Only this sheriff and these district attorneys don't act normal-they have a hate agenda and they abuse their discretion for or against persons completely outside of their duties. Plaintiff is being denied any kind of victims rights under the law and witness protection. However, these defendants went in the complete other direction they provided information to the criminals and facilitated more acts against plaintiff then covered for the criminals threatening and gang stalking

plaintiff and his family. This amounted to "Reckless Endangerment" of plaintiff under the guise of authoritative discretion. And this is exactly the kind of KKK style abuse plaintiff has endured for years and is still ongoing with these defendants. No ethical authority would justify notifying the criminals of the witnesses name and whereabouts then sit back and do nothing as the criminals terrorize the witness-that is a criminal conspiracy,an act outside of any duties of office,and an obstruction of justice. The public record is full of these reports of crimes, e-mails and calls for police service that never occurred, and pleas for justice that are yet to be initiated. Why is it still not being investigated and prosecuted? Because in this KKK style government these defendants have established that justice and protection of law is based on your political stance and your position in their politically closed community. And they have all areas of authority covered and they all protect each other from exposure from people like plaintiff who dared to complain about them. Exactly the program the KKK established to protect one kind of person while abusing another with the establishment. And it has been made perfectly clear by threats made by Sheriff Doughtie and the continued crimes against plaintiff that abusing plaintiff is the agenda while they flaunt their discretion and immunity like it were some god giver right.

**23. CLAIM: Sheriff Doughtie and Deputy Ruth and others in the Dare County Sheriff's Dept. engaged in the Gang Stalking and recruitment of community Gang Stalkers for the purpose of enforcing their own and their supporters political opinions against animal advocates and environmentalists. And they targeted plaintiff after it was known that plaintiff was collecting evidence and documenting incidents adverse from their politically enforced opinion. This meets the**



**definition of a violation of the Federal Gang Stalking Laws which make it illegal and a federal crime to commit such acts. It is also a discrimination against plaintiff for his political affiliations and a violation of his US Constitutional Rights.**

39. The crimes and reasons for those crimes committed against plaintiff by Cullen Gaskill, just one of the gang stalkers Sheriff Doughtie recruited then let loose on plaintiff, make the situation as plaintiff describes it abundantly clear. Cullen Gaskill and Tanner Powers were both turned in to Sheriff Doughtie as the persons responsible for deliberately running down animals on Hwy 12, the persons responsible for running over the endangered Sea Turtle and Piping Plover nests on the Cape Hatteras National Seashore, and for multiple abuses to stray cats that were on Gaskill's property. Cullen Gaskill was also in the Hate-Audubon group and a volunteer fireman meaning he was under the "good ole boy" protection. Pictures of some of the illegal animal kills were sent via e-mail to US Senator Kay Hagan because at first she supported the Audubon lawsuit to close beaches then later switched sides. The e-mails to Senator Hagan's aids first Shaniqua McClendon at shaniqua\_mcclendon @hagan.senate.gov (202-224-6342) then John Minor at john.minor@hagan.senate.gov all detailed the illegal killings with photographs and are an accurate description of events in real time. And plaintiff had multiple phone conversations with McClendon and Minor who assured him Senator Hagan was receiving the information. These e-mails and conversations included information about Sheriff Doughtie and his deputies covering up the illegal killings and not cooperating with the National Park Service when they knew who was driving over the nests of the endangered animals. Additionally, plaintiff told federal authorities that he believed that the 100+ pelicans illegally killed and mutilated in Top Sail Beach, NC,

sounded similar to one of Cullen Gaskills hunting trips here where he would sit on the tailgate of his truck, throw food to the Sea Gulls, then shoot them until the ground was covered with dead bodies. Plaintiff witnessed the aftermath of one of those hunting trips where a field by his home was so covered in dead Sea Gulls that it looked like the field was covered in newspapers. And this was a regular pass time for the hate-Auduboners they called hunting. It needs to be noted for the Court that Sea Gulls and Pelicans are protected birds and illegal to kill. This should not be hard for the Court to understand why this would be so damaging to the local community if it were made known to the Audubon Society and their lawyers during the lawsuit and why Sheriff Doughtie would want it kept from the public and outside authorities. Just one of many obstructions of justice Sheriff Doughtie committed to further his and this community's political agenda. And when plaintiff turned in Cullen Gaskill to Sheriff Doughtie they went to Gaskill and told him who turned him in and stood back while Gaskill threatened and terrorized plaintiff and his family. There are at least 8 months of hundreds of e-mails to Sheriff Doughtie, all of which were forwarded to Gov. Mc Crory to be made public record, detailing Gaskills stalking and crimes against Plaintiff as proof of Sheriff Doughtie's refusal to stop the terrorism. Cullen Gaskill and Tanner Powers followed plaintiff to the Lighthouse parking lot, held up a shot gun and stated quote: "we kill everything" then proceeded to come to plaintiffs home a dozen times a day to run over animals and floor his vehicle to intimidate plaintiff and his family. And this is while the community put out a hate environmentalist video sponsored by the Dare County Board Of Commissioners depicting environmentalists as quote: " American Terrorists", a political position being enforced onto the public by a group of gang stalkers backed by Sheriff Doughtie and the

Dare County Sheriff's Dept. So plaintiff had Gaskill, Powers, and multiple members of the hate-environmentalist stalkers flooring their trucks and running down animals crossing the road including plaintiffs cats and Sheriff Doughtie found no reason to stop it or arrest Gaskill. Even after Gaskill tried to run down plaintiff with his truck on several occasions did Sheriff Doughtie find any reason to stop Gaskill. And the e-mail record to Sheriff Doughtie and calls for police assistance made in real time with details of the gang stalking and crimes along with pictures of the illegally run down animals, all forwarded to Senator Hagan and Gov. Mc Crory, make it abundantly clear what Sheriff Doughtie's position was-to allow them to terrorize plaintiff and give him no protection of law against these people what so ever. To drive home the point of Sheriff Doughtie's position against plaintiff for the gang stalkers is what happened when plaintiff heard from Gaskill's own mouth that he had thrown some live kittens into the air and shot them with a shotgun. These cats were stranded on the Gaskills property, were there when a rescue organization tried to save them, then gone after Gaskill made his boast. And Sheriff Doughtie was asked to save those cats by plaintiff before harm came to them from Gaskill. When plaintiff questioned Gaskill's friends about whether he really did it their response was quote: "yea and he's done a lot worse". So there are witnesses to this crime. When Sheriff Doughtie refused to act on the information plaintiff put a petition on the internet asking for support to bring the cat killer to justice and to rescue other cats in similar situations on cat haters properties. And when the petition was gaining signatures Sheriff Doughtie went on Channel 3 news in Norfolk and the local news papers and declared the petition a hoax to cover up the crimes. The Dare County Sheriff Dept. investigation was to go to Gaskill's mother and ask her if Cullen had done

it. That was the depth of their investigation prior to Sheriff Doughtie's public statements that the petition was false. Here it should be noted that Sheriff Doughtie used his authority to keep the public from knowing the truth about the cats and to protect the hate-Auduboners position that no animals were being harmed on Hatteras island- something completely and utterly false then and now. And this should have been realized when just months after Sheriff Doughtie misled the public into believing the cats here were not being abused and illegally killed, the Friends Of Felines Hatteras Island had an entire colony illegally killed in Avon, 10 minutes from plaintiff's home, in Dec 2014. Sheriff Doughtie's press releases are permanent public record in complete contrast to the actual events and evidence and completely contradictory to the press release from Friends Of Felines Hatteras Island on Channel 10 News in Norfolk. And the gang stalking continues today without intervention from Sheriff Doughtie or the Dare County Sheriff's Dept. or District Attorney's Womble, Cruden, Bland, or NC Attorney General Josh Stein or NC Governor Roy Cooper by multiple Hate-Audubon members despite there is a lengthy public and e-mail record to verify the crimes and gang stalking reported to all these authorities. And when plaintiff continued to provide proof on the internet of crimes against people, the public and animals these authorities used abused their authority to silence plaintiff putting everyone and all the animals at risk. The result animals continue to be deliberately run over and plaintiff is trapped in his home by the Sheriff and his gang stalkers. A complete review of the e-mail record and notes typed by the police dispatcher when plaintiff made calls for police service will verify all the facts stated in his complaint. All of which has been forwarded at one time or another to the above defendants who took no action despite it was their duty to act. It has to be noted

for the Court at this point that the Audubon Society and Defenders Of Wildlife both received and reported acts such as this of threats and intimidation during there visits to the National Park here. Many were covered by the press during the lawsuit.

40. Another significant crime reported to Sheriff Doughtie, Deputy Ruth and DA Cruden was Chris Bock who is a NCDOT supervisor using an illegal trailer and switching the license plates from a legal trailer when he wanted to use the illegal trailer on public roads. Plaintiff knew Deputy Ruth was faking an investigation into the illegal cat killings at the Quarter Deck Restaurant when he observed multiple illegal acts committed by Chris Bock at the Quarter Deck while Deputy Ruth claimed to have cameras up to catch the cat killers. And one of which was Chris Bock, who as a supervisor in the NCDOT who are responsible for the transportation laws who would know what those laws were, was breaking them right in front of the cameras Deputy Ruth had supposedly put up. Deputy Ruth could not be oblivious to the danger to the public if Bock's illegal trailer being used on public roads with no safety features, no state inspection, and no insurance or title were to injure or kill an innocent member of the public. Not only would Deputy Ruth know the danger and the illegality of the acts but Chris Bock would be also completely aware of the illegal and dangerous nature of his acts. Yet even after plaintiff notified in writing by e-mail the illegal acts committed by Chris Bock to Sheriff Doughtie and Deputy Ruth did they take any action to stop Bock from repeating the illegal act, which he did over and over again, or prosecute him for the acts already committed. This is that immunity from prosecution plaintiff is detailing in his claim of a KKK style government. This also made plaintiff realize those cameras would not yield any evidence of any cat killings also. And when plaintiff searched the property for evidence

he found one of his favorite cats dead that had been drowned in a living trap then thrown into the Sound. Her body discarded like trash in the weeds. Afterwards when plaintiff questioned Deputy Ruth about what he had seen on his cameras, Ruth lied and stated he hadn't seen any cats being killed at all. Impossible if the cameras were there at all. Likewise, when plaintiff confronted Ruth that he must have evidence on camera of Chris Bock using his illegal trailer with the switched license plate, Ruth first tried to lie then tried to rationalize that the cameras were not there to catch other crimes. So plaintiff concluded accurately that the cameras were not there to catch the Bocks killing cats, they were not there to catch the Bocks selling drug and plaintiff had witnessed many many drug deals that would have been caught on camera, and they were not there to catch the Bocks committing any crimes. So what were the cameras put there for? Nor did Deputy Ruth respond when a trapper from the hate-environmentalist video showed up and use illegal clamp traps to kill the cats-all of which would have been caught on video. In total 17 cats were killed by the Bocks the entire time Deputy Ruth claimed to have cameras up to catch the cat killers. And recently we learned that Deputy Ruth had told Chris Bock about the cameras being put up while the cameras were there to catch the Bocks who had made threats to kill the cats. How effective could any surveillance be when you tell the suspected criminals you are putting cameras up to watch them? No known law enforcement procedure could be so negligent or contradictory. It could only be concluded from the facts that Deputy Ruth and Sheriff Doughtie were faking an investigation,protecting the Bocks from criminal prosecution,and/or trying to discredit that the cat killings were even happening to make their press release seem true and back up the hate-environmentalist political position.

Let it be clear that plaintiff witnessed the drug dealing at the Quarter Deck Restaurant by Tiffany Bock and Eddie Ochs, the Bock's uncle and a known drug addict, for more than six years on a daily basis when he was there feeding the homeless cats. And this is the subject of plaintiff's alleged acts of cyber stalking. Meanwhile during this time, Sheriff Doughtie was making press releases to the Virginian Pilot Newspaper that he was requesting persons to come forward and tell them who was dealing drugs. But when Sheriff Doughtie got what he requested from the public, from plaintiff, he did not respond to the information as a good law enforcement officer would. In fact while Deputy Ruth claims to have been filming with cameras at the Quarter Deck Restaurant where he most certainly would have caught the drug dealers he was seeking, he ignored the video and pursued others who were not the ones actually selling the drugs. An example of Sheriff Doughtie and Deputy Ruth deceiving the public while protecting the very drug dealers they claimed to be pursuing. Corruption is also a fraud committed against the public using your authority or abusing your discretion. And the Court should wonder how many Over Dose deaths or wrongful prosecutions occurred as a result of this political protection Sheriff Doughtie and Deputy Ruth provided to the actual drug dealers. And this would go equally for the drug dealer Kevin Morris who imports most of the cocaine and marijuana to the Buxton area if not all of it. Additionally, plaintiff learned during this time from an employee of the Hatteras Ferry Docks, where Chris Bock is the supervisor, that Chris Bock is known to abuse and kill the cats there at the ferry dock where they try to find food at the dumpster. The employee that confided in plaintiff also feels sorry for the cats and put food out for them there. This shows how the KKK style government overrides the "whistle blower protections" for this ferry dock employee who

would like to come forward and end Chris Bock's abuse of the cats there at the ferry docks but is afraid because he knows the sheriff's deputies will tell Bock who was telling on him and he'd either lose his job or would be intimidated and run off the island. With no one to get help from. Just like what plaintiff is reporting in this complaint. The Court should note the Bocks and their friends and relatives are still threatening and intimidating plaintiff with the gang stalking to present.

**23. CLAIM: PLAINTIFF was denied Equal Protection Of Law for acts of sexual assault against him and his 14 year old girlfriend and all these defendants went one step further and have obstructed justice both criminally and civilly by their efforts to cover up the crimes and protect the criminals responsible who happen to be their political supporters.**

41. There is no limitations on receiving justice for the sexual assault plaintiff endured when he was 14 years old. A sexual assault designed to give plaintiff VD which succeeded damaging his bladder for the rest of his life. But plaintiff has no one to receive justice from or protection of law. NC Attorney General Josh Stein has been informed of the crime and has forwarded that information to District Attorney Womble, Cruden, and Bland yet no action has been taken to restore plaintiff's rights in any way. Plaintiff's victims rights have been completely done away with by the KKK style abuse plaintiff is enduring. Nor has any effort been made to give protection of law to plaintiff's girl friend who was raped also when she was 14 years old just a few months before plaintiff's sexual assault. All of these defendants act to defend the KKK style government over the need to prosecute these crimes. Their acts are outside their duties of office and they have compromised and manipulated the judicial system to that



end for their own personal prejudices. It cannot be concluded that the need to silence plaintiff from revealing the names of the perpetrators and the details of the sexual assaults is more important than bringing such criminals to justice. This kind of rationalization only has precedence in a completely corrupt system of judicial procedure. Plaintiff made it clear to all defendants that David Stowe was responsible for his 14 year old girl friends rape. That he was responsible for the statutory rape of her cousin over several summers. That there is an effort by Sheriff Doughtie, District Attorneys Womble, Cruden, Bland to silence plaintiff with false cyber stalking charges to keep plaintiff from revealing the details of the rapes and other affluent members involved. This is an obstruction of justice. This is an obstruction of justice for other crimes committed in connection to these rapes. This is a complete abandonment of the victims and the values of justice the laws were meant to protect and a complete abandonment of the duties all of these defendants have to the victims, future and other victims, and to oaths of office they took. And each should be considered acting outside their authorities and immunities thereof and should be considered acting out there own personal prejudices against plaintiff to protect the member of their KKK style society. The horrific details are as follows for the consideration of the Court:

Lisa was Joe Shield's niece, Joe Shields owned the Surf And Sound campground in the 1970s, Lisa came to stay at the campground for the summer in 1976, and plaintiff was her boyfriend that summer. Plaintiff worked at the Surf And Sound Campground as did David Stowe. David Stowe had been dating Joe Shield's daughter for a few summers throughout those summers. Plaintiff witnessed David Stowe having sexual relations with her in the back of Stowe's blue Chevy Camaro on multiple occasions throughout 2

summers in 1975 and 1976. At the end of the summer in 1976 after plaintiff went home Lisa continued to drink liquor given to her by David Stowe until she was passing out from the alcohol. The details of what happened were relayed to plaintiff by Mark Speiss who was there during the sexual assault. Lisa had passed out in the back of David Waterfield's van and while Lisa's cousin, 8 year old Raven, David Waterfield, Bobby Barnett, David Stowe and Joe Shield's daughter, and some other older man who they stated committed the sexual assault, stood by drinking and when David Stowe was trying to have sex with Joe Shield's daughter the older man raped Lisa passed out in the back of the van while no one did anything to stop it. Afterward, Speiss indicated that he thought the man was trying to get the rest of them to do it to her too. Speiss then stated Lisa wanted to go home after she regained consciousness but Waterfield would not take her home because he did not want to be accused of getting her so drunk or what had happened to her. Lisa, Speiss confided, was still too drunk to even stand up. So Waterfield forced David Stowe to stop what he was doing with Joe Shield's daughter and have her try and sneak Lisa in past her parents. Speiss related to plaintiff that this ultimately failed because Lisa's mother found her drunk and when she undressed her daughter found blood in Lisa's underpants and knew she had been raped. Lisa was a virgin until that night. Plaintiff only saw Lisa once the next day without knowing what had happened to her but later when plaintiff was at work at the campground after school Joe Shields approached plaintiff openly carrying a loaded Colt 45 handgun and asking who was present the night before. Plaintiff told Shields his father made him go home for school at 10:00 pm and Shields called plaintiffs father and verified that. But Shields still would not tell plaintiff what had happened. The following evening Lisa was allowed to

spend a couple of hours with plaintiff because she was leaving for her home the following day. Plaintiff knew from her grief and things she was saying something horrible had happened to her. Plaintiff remembers her saying "I guess you don't want me anymore" but she did not know plaintiff did not know what had happened to her. Plaintiff tried to console her and was acting as if he still loved her but she was inconsolable. Speiss relayed the full details after Lisa had left fearful of Joe Shield's wrath should he get caught. And the alleged older man had fled town fearing he would be killed by Joe Shields. Plaintiff had exchanged phone numbers and addresses with her but plaintiff only spoke with her once on the phone after that and wrote her twice during the year after but never saw her again. David Stowe was then forbidden to date Joe Shield's daughter but they snuck around and continued their relationship anyway. Plaintiff remember these details because it has left a scar that did not diminish with time. A month or so after the previous incident while plaintiff was 14 years old the following happened to him:

Plaintiff was picked up hitchhiking to go to Buxton to play pinball by Norma Johnson who was 19 years old at the time. She stopped at Frisco Shopping Center and bought 2-8 packs of Miller in the bottle then insisted plaintiff drink one of them. She parked on an old abandoned road near the lighthouse and wanted plaintiff to finish the entire 8 pack. As plaintiff became drunker she stated she was going to get plaintiff drunk and "fuck" him but plaintiff thought it was just a joke considering how much older she was than plaintiff. When plaintiff had finished the entire 8 pack he was stumbling drunk and her comments became a reality. She climbed into the back and insisted plaintiff get back there with her. Plaintiff thought it was still a joke and tried to laugh it off but she

was insistent. When plaintiff hesitated she used the ploy she would tell everyone plaintiff was a fag if he didn't do it with her. Plaintiff's reasoning at that age was that in such a small town being called a fag by her would be devastating to him and would destroy any hope he had with the older girl he actually had a crush on Anita Austin who road with him on the bus and put in her year book statement of the things she left behind " she leaves Danny because he couldn't come". So plaintiff facing reputation man hood castration had no choice but to comply. At one point plaintiff could see the lights of Buxton and considered just running away but knew she would make good on her threats to tell everyone the lie. Plaintiff got in the back and and complied but to make it clear this was plaintiff's first time having sex or that he even knew how to have sex and just how drunk he really was, while plaintiff was in the act he told her he had to pee and she said go ahead but she did not let plaintiff up and was holding him in the position, so plaintiff thought by drunken reasoning that you just peed while having sex and it was normal, so he peed inside of Johnson which thankfully ended the act. Norma Johnson then drove us back to her house in Buxton, pulled up in her driveway with plaintiff still in the vehicle and too drink to walk, put a huge hicky on plaintiff's neck to mark him, then dumped him out on the roadside in front of her parents house for him to hitchhike home. And by the time plaintiff woke up the next morning she had told everyone plaintiff now had VD. Norma Johnson was not out to have sex with plaintiff. She was trying to give him venereal disease which she succeeded in doing which damaged plaintiffs bladder for the rest of his life. Norma Johnson according to the rumors floating around afterward had been given VD from Stockton Midgett and/or his sons who were manipulating her as an overweight underclass girl with fantasies of being with and loved by the richest

men in town to have sex with her. In reality they cared nothing for her and were playing mental games with her to pass her around as their sex toy. When she contracted VD from them she thought her dreams of being the queen of the island were going to come true, because she had evidence and something she could use to blackmail them with if need be, but Stockton Midgett, being the richest man in town, had his medical records altered and to squash rumors outed her as a slut and a liar, and her dreams came crashing down. Along with the knowledge she had been being used. Her only other chance to get them back was to give the VD to someone else and hope it all came out after the disease was traced back to its source which would be her saying again it was Stockton Midgett and his sons. And that is exactly what happened. When plaintiff told the Doctor who he got it from Norma's parents got involved and spread the knowledge their daughter had got it from the Midgetts. But that was not all this did to plaintiff. Stockton Midgett being guilty of the spread of the disease and not being able to blame Norma focused on plaintiff and did his part to use his influence as the richest man in town to put plaintiff's parents gas station out of business. And still this was not the end of the horror for plaintiff. After he had moved back to Virginia Beach, plaintiff returned to camp with some friends here in Frisco. Plaintiff had spotted a pile of trash at a house being built and thought they could harvest some scraps and have a fire at the campground. Mark Nicewonger (spelling may be incorrect) who was driving the van got stuck when he pulled into the sand. After the van was unstuck the sheriff at the time in 1978, plaintiff was almost 16 years old at the time, pulled up and we explained who we were and that we were just taking some scraps for a fire. However, the sheriff radioed dispatch who called Stockton Midgett and we were held there until he arrived. When

Midgett arrived he immediately got out of his car with a handgun, grabbed plaintiff by the arm and took him into the nearby field saying he was going to kill him. Midgett tried to get plaintiff to get on his knees execution style but plaintiff tried to edge his way toward the trees to make a run for the trailer court just 1500 yard away where his uncles and aunts lived. Plaintiff pleaded who he was and that his uncle and aunt just over there would vouch for him but Midgett kept saying "" you don't know how to keep your mouth shut boy do you?" and kept pointing the gun at my face. Mark Nicewonger was over beside the van pleading crying pleading with the sheriff that we only took scraps which was true there was nothing in the van but trash from their trash pile. Nicewonger was pleading to call his parents in tears. The Sheriff at this point was telling Midgett quote: " these boys parents are going to come looking for them-I can't be a part of this" over and over again meaning this murder was really about to happen which scared Nicewonger even more knowing he'd be killed as a witness. Then after the Sheriff pleaded with Midgett to stop he brought plaintiff back over to the van at gunpoint still and made both of us unload the trash as if we had been thieves and deserved the whole episode. Plaintiff has not spoken to Nicewonger for about 30 years but is sure he will remember the incident considering the danger he was in. It is not often you almost get murdered by the richest man in town while the Sheriff stands by and has to dissuade the gunman not to pull the trigger then the gunman gets to just walk away. Plaintiff will also be glad to take a lie detector test to any of these details.

Plaintiff has spared the Court some of the more explicit details of his sexual assault, like plaintiff not knowing what VD was and him not knowing that he had it and waiting until blood and puss were seeping out of his penis all the time or the efforts he made trying

to keep it a secret from his mother or his knees buckling from the pain when trying to urinate or the humiliation of finding out what had actually been done to him and the knowledge the whole town knew even when plaintiff was unaware, but wants the Court to note that the incident is as fresh in his mind as if it happened yesterday and plaintiff can recall more details if need be. And that details such as them cannot be fabricated and provide context to the crimes. Details that such a horror leave with the victim all the days of their lives. Details that Sheriff Doughtie, Deputy Ruth, and DAs Womble, Cruden, and Bland are silencing in furtherance of their own illegal agendas while completely denying plaintiff any Equal protection Of Law. The Court surely will not contend that publicly speaking of such details is now a crime if the details are against affluent members of the community that the Sheriff and District Attorneys are affiliated with and want to protect.

As the victim of these 2 sexual assaults at the age of 14 years old, the first indirectly and the second directly, Plaintiff asserts a right to at least speak out as a victim about the crimes. As a victim of the crimes plaintiff should possess Equal Protection Of Law from the crimes. But somehow he is being blocked, obstructed, from seeking justice and these defendants have gone even further to silence plaintiff about the crimes by claiming his speaking out is a crime of cyber stalking the criminals who have victimized him. There could be no more backwards justice. Or clear indication of the KKK style government in force here. How could this pastor, David Stowe, and others who took part in both sexual assaults command such power as to have these authorities silence the victims of the sexual assaults. Have they achieved such a place in society that they possess complete immunity from their past crimes and the full weight of the law

punishes victims like plaintiff for speaking of them. These defendants have all gone beyond any legal reasoning or rule of law to silence plaintiff and are enforcing their own style of personal justice based on their dislike of plaintiff and his political positions and are upholding their own kind of KKK style rule of law.

42. To any normal person including members of this Court, if they saw someone pull up in front of their home, roll down the passenger side window from the driver's seat, then flick a lit cigarette into the dry grass surrounding their vehicles and then come back from the other direction and do it again, they'd say that person was trying to light their vehicles on fire. And that is exactly what Kevin Morris did on numerous occasions from Dec. 29th 2017 to June of 2019. And this was in addition to him yelling threats and driving back and forth several times in a half hour flooring his vehicle. This has gone on now for 22 months without any type of protection of law. And this is just one of the many people who are doing this. But with this person, this is the drug dealer plaintiff reported to Governor Cooper on his online petition that Sheriff Doughtie called up and told plaintiff was reporting him to outside authorities for being a drug dealer. And while this has been going on both plaintiff and another victim, Christine Hutten, has called and reported the crimes. Yet, Sheriff Doughtie cannot catch the drug dealer stalking plaintiff almost everyday for 22 months. What could be a more clear indication of Sheriff Doughtie, first initiating then sanctioning a gang stalking. And Chris Bock and his friends, also recruited by Sheriff Doughtie by notifying them of plaintiff's online petition reporting their drug dealings and other crimes, also have been doing this on an almost everyday basis with Sheriff Doughtie's blessing and protection. More evidence to Sheriff Doughtie's involvement in the gang stalking. Any normal person, let alone someone in law



enforcement or in the position of legal authority that DA Womble, Cruden, and Bland maintain, would know it was reckless endangerment for Sheriff Doughtie and Deputy Ruth to notify dangerous drug dealers that someone informed on their crimes. Here Sheriff Doughtie and Deputy Ruth called them up and told them then unleashed them on plaintiff and gave them complete immunity to harass, threaten and stalk plaintiff to no end. Any normal person would also know Sheriff Doughtie and Deputy Ruth were allowing the gang stalking after they initiated it by not even trying to catch these criminals showing up at plaintiff's home. Which would be constitutionally required Equal Protection Of Law. Any person would know that Sheriff Doughtie and Deputy Ruth trying to charge plaintiff with cyber stalking was to cover up their actual motives which was to gang stalk plaintiff into submission or drive him out of town. And any normal person would know that DA Womble, Cruden, and Bland trying to uphold the false charges on behalf of these criminals to assist Sheriff Doughtie and Deputy Ruth in this gang stalking while they victimize plaintiff to know end is criminal behavior in and of itself. Even in the face of video of the criminals physically stalking plaintiff they continue to try and manipulate the legal system to cover up their criminal agenda. DA Bland is especially guilty because she put on and witnessed testimony from her 3 alleged cyber stalking victims that they had armed themselves with guns and were planning to use them on plaintiff. DA Bland was at that point on notice that 2 known drug dealers and a rapist had admitted to carrying guns to use on plaintiff and were coming to plaintiffs home looking for him to create an incident where they could shoot plaintiff and claim self defense. Any normal person would see this as an attempt to murder plaintiff. Any normal person would see this as a sanctioned gang stalking by Sheriff Doughtie, DA

Womble, Cruden and Bland and an eminent ongoing severe danger to plaintiff whose only crime was to notify Governor Cooper that these corrupt authorities were protecting affluent drug dealers and criminals. And any person would see that these criminals were frustrated that plaintiff won't leave his home and accommodate their plot by their constant trips to plaintiff's home and their arrogance in their threats while DA Womble, Cruden, and Bland struggle to pretend 22 months of this physical gang stalking is somehow justified from their false charges of cyber stalking against plaintiff. Any normal person would see this conspiracy has gone from silencing and driving plaintiff from their town to one in which plaintiff may lose his life or have his life totally ruined for good. And meanwhile these authorities pretend it is completely irrelevant that these criminals have victimized plaintiff over and over even before the most recent agenda, that plaintiff has witnessed them committing much more serious crimes such as drug dealing and rape, that they came to plaintiff's house on Christmas and killed his cat which prompted the online reporting of crimes, and that plaintiff never communicated with any of them to warrant the charges in the first place. But it is not irrelevant to plaintiff that Sheriff Doughtie, Deputy Ruth and DAs Womble, Cruden and Bland have recruited these criminals to commit what they are planning to pass off as a justifiable homicide when in actuality it will be murder. Here there is no other reasonable explanation. No normal Sheriff, no normal District Attorney would disregard all the crimes being committed against plaintiff, both past and occurring, and have their sole focus of law on bringing plaintiff to justice for a crime plaintiff is not guilty of where he did nothing but pass on lawful information to Governor Cooper plaintiff thought would end the assault on the animals, cats, and his family. Any normal person, put in the position plaintiff was put in

by these corrupt authorities, would try to seek help from outside authorities to stop the violence against these innocent animals and cats and expose the corruption that was killing them. And nothing justifies the reactions of these corrupt authorities and their efforts to cover up their crimes. Let this statement be very clear to the Court: " THE EXACT CORRUPTION PLAINTIFF HAS DESCRIBED IN HIS CHANGE.ORG PETITION UPDATE TO GOVERNOR COOPER HAS PLAYED OUT AND STILL IS PLAYING OUT EXACTLY HOW PLAINTIFF DESCRIBED IT IN THE PETITION UPDATE"! And there is abundant facts and evidence to show it. Equal Protection Of Law is to protect plaintiff from the very acts described and he has gotten none from any of the authorities. Freedom Of Speech is so victims and witnesses such as plaintiff can speak out about the crimes that have happened to them or that they have seen but plaintiff is being silenced by threat of false prosecution from these authorities. Plaintiff has been afforded no victims rights, no whistleblowers rights, or any rights what-so-ever from these authorities. And both Governor Cooper and NC Attorney General Stein have been continually informed of these authorities crimes and the crimes they are covering up making them accessories after the fact and guilty of obstruction of justice. The Court should answer: if not these defendants who is responsible for acting on these crimes reported? Who is supposed to protect the public? Whose duty was it to act?

43. But the previous was not the most recent attempt to burn plaintiff out of his house. Directly after Hurricane Dorian which occurred on Sept. 6th 2019, after plaintiffs home was flooded, some of the gang stalking hate-environmentalist members brought old gasoline, hydraulic fluid, brake fluid and other toxic flammable liquids and piled them up against the trees in front of plaintiffs home then drove by flicking cigarettes at the pile.

They put the flammable liquids there under the guise of pretending to be discarding hurricane damaged property-something they thought would be thought of as just an accident. However, there was already a pile across the road where they could have put it and a safer open area 100 feet further down where it would have been easier to pick up yet they chose to put it in front of the persons home they were stalking. In front of a cat rescue compound where the cats would be trapped and burned to death. And they did it when the road was closed and no rescue could take place. Then there drive byes flicking their cigarettes into the pile was obvious. Plaintiff had to drag the pile away from his home and Christine Hutten reported it to authorities who made there same gang stalking response which was to deny anything asked from us. This was their most recent attempt to catch plaintiff's home and cat rescue compound on fire and they did it when the island was under a state of emergency after a major Hurricane and flooding. Done by the same group who know plaintiff and Ms. Hutten cannot call 911 or for any police,fire,or ambulance assistance and if they did it would all be written off as an accident and any conspiracy to harm them ignored.And what action has been taken to end these attempts-NONE BY ANY OF THESE AUTHORITIES.

44. Plaintiff has had cause to charge Kevin Morris,Chris and Tiffany Bock, and David Stowe with crimes they have committed against him. But Sheriff Doughtie and Deputy Ruth by threat and their actions to gang stalk plaintiff and illegal support of the criminals have made plaintiff too afraid to appear before the magistrate, whose office resided within the Dare County Sheriff's Dept., to file the charges. As previously stated Morris, Bock, and Stowe and their friends have enjoyed complete protection from Sheriff Doughtie, Deputy Ruth, and other members of the Dare County Sheriff's Dept. while

terrorizing, threatening and stalking Plaintiff and Ms. Hutten who also lives in the home. Ms. Hutten also has cause to charge these 3 individuals with stalking and threatening but is too afraid to try and appear before the magistrate. This is a violation of their equal protection of law rights. Likewise, District Attorney's Womble, Cruden and Bland have facilitated this stalking and threatening and both plaintiff and Hutten believe, for good reason, that these District Attorneys would abuse their discretion and refuse to prosecute another violation of plaintiffs equal protection of law rights. While these 3 criminals, a drug dealer, a drug dealer and cat killer, and a rapist, continue to victimize Plaintiff and Ms. Hutten, without interference by law enforcement, District Attorney's Womble, Cruden, and Bland continue to pursue a false conviction against Plaintiff for allegedly cyber stalking these criminals with his petition to get Governor Cooper to prosecute them. The Court cannot disregard that Plaintiff is a victim of these criminals many times over before being charged for contacting Governor Cooper about them and has now been continually victimized by them under the guise that Plaintiff has somehow cyber stalked them without ever contacting them at all. Plaintiff should have been protected by law, victim and witness rights, and the whistle blower laws for reporting the defendants abuses yet got no protection at all. Plaintiff is being prosecuted for reporting the crimes and being victimized by them but cannot get District Attorney Womble, Cruden, and Bland to prosecute for drug dealing, drug dealing and illegal cat killings, and rape and statutory rape. There could be no better contrast of an abuse of discretion or a violation of equal protection of law. Likewise, Sheriff Doughtie and Deputy Ruth have their friend the magistrate tucked away within the Sheriff's Dept. , where Plaintiff and Ms. Hutten are afraid to go, to prevent them from charging these 3 criminals and

others gang stalking members with misdemeanor crimes. Leaving Plaintiff and Ms. Hutten no protection of law what-so-ever.

**24. CLAIM: District Attorneys Cruden and Bland engaged in and carried out blatant back room deals with Judge Trivette to obtain convictions of people they found unworthy of the right to Equal Protection Of Law and obtained convictions in complete contradiction to the rule of law. This was the policy, practice, standard, custom they had organized and participated in for the purpose of creating miscarriages of justice against people they discriminated against and wanted to punish for their political views or class standing in the community. These type of railroad jobs, as they are known to be, are common in the Dare County Court system and plaintiff was victimized by it on several occasions. This was an illegal arrangement to control and manipulate the judicial system and the outcomes of trials in violation of the US Constitution and their oaths of office.**

45. An additional horror Plaintiff's have suffered is the fact that District Attorney Bland and Cruden were able to arrange a back room illegal deal with a District Judge, Judge Robert Trivette, to give them convictions without any rule of law or evidence to support the convictions. Plaintiff's attorney, Daniel Donahue, described the ordeal as quote: kangaroo court then e-mailed Plaintiff consoling him for the unjust corrupt treatment saying in an e-mail dated Feb.5th 2019:

"For what it's worth, two very accomplished and wise lawyers who were in the room stopped me to say that the judge flat-out got it wrong. When he suggested we appeal his ruling, I knew that he was second-guessing himself.

Almost all of the testimony was irrelevant. The DA was trying to establish that the alleged victims were afraid by the post. However, that was not an element to the crime so I didn't care that it came in. The judge seemed to be letting in all the evidence so that he could make a "gut" call, not a legally sound ruling.

You did the right thing by fighting this case and I trust you will ultimately prevail. Once you get a superior court judge who is not local, you should be in good shape."

The key statements from this licensed attorney being "not a legally sound ruling" and "once you get a superior court judge **who is not local**" meaning the corruption being displayed is evident and DA Bland had made some sort of deal to get a conviction without evidence to support it. And now that another "**local Judge**", **Judge Tillet**, is presiding over the case by DA Bland's manipulation of the docketing procedure, Attorney Donahue has abandoned his own words and no longer wants to try a case he lost without any lawful meaningful evidence being presented against his innocent client. Likewise, Attorney Donahue has indicated 2 other witnesses, 2 "accomplished and wise" lawyers, saw the corrupt conviction occur and were concerned enough about it to console Donahue. Again to recap previous information in this complaint, Plaintiff was charged with 3 counts of cyber stalking b(2), "repeated electronic communications", a charge designed to obstruct justice and protect the criminals reported by Plaintiff, where **NO ELECTRONIC COMMUNICATION** ever took place. Corruption such as this is obvious, especially to trained attorneys, and is the very corruption described by Plaintiff to Governor Cooper in the change.org petition used to charge Plaintiff with the crimes. And it is the same corruption Plaintiff fears will prevent him from getting justice against his attackers and gang stalkers. A review of the federally protected petition and the statements made on that petition protected by freedom of speech make obvious what DA Bland, Cruden, then Womble were trying to silence and how inconsistent the

evidence was for the charges. The only logical conclusions are that they made an illegal deal with this judge to get a false conviction or the judge has become too incompetent to sit on the bench because he has now abandoned the rule of law. Another statement Attorney Donahue made during the trial to that point was when he said to the judge that the evidence presented by DA Bland was not sufficient to prove liable in a civil court let alone in a criminal trial. And when Donahue presented the jury instructions to the judge for cyber stalking b(2) and that NO element of the offense had been proven Judge Trivette continued to abandon the rule of law to give DA Bland her conviction. The charges were initiated by Deputy Ruth and Sheriff Doughtie to abuse Plaintiff then DA Bland made an illegal deal to have Judge Trivette help them obstruct justice. No other logical explanation is available considering the context of plaintiffs statements and the constitutional and other protections protecting his actions. Meanwhile, Plaintiff is still being denied any kind of protection of law or prosecution for the crimes committed against him and Ms. Hutten. Most of which are serious felonies with no statute of limitations meaning -even after Plaintiff put DA Womble, Cruden, and Bland on notice of the obstruction of justice by the filing of this lawsuit no effort has been made to correct the constitutional violations or bring these criminals to justice as the law would dictate. And that goes likewise, for NC Governor Cooper and NC Attorney General Stein who have also been served this lawsuit. The obstruction of justice is ongoing, the equal protection of law is ongoing, the gang stalking is ongoing. With no end in sight and no legal remedy to end it being offered by any of these defendants. Only more corruption to cover up the illegals acts already committed by these defendants.

**25. CLAIM: Sheriff Doughtie made threats by phone to plaintiff with the purpose**



**of obstruction of justice both criminally and civilly.**

46. Sheriff Doughtie has made a threat to Plaintiff. Sheriff Doughtie stated by phone, " if you put my name on the internet one more time, I might not get any money out of you but you're gonna know I was there!". But this was the second time Sheriff Doughtie threatened Plaintiff over the phone. The first time Sheriff Doughtie stated, after Governor Perdue responded to Plaintiff's reports of animal and cat killings by contacting Doughtie, "that if you ever tell anyone I'm not doing my job again I'm going to sue you!". And you can see by the context of the second threat Sheriff Doughtie was advised he could not sue those reporting him for not doing his job and get monetary compensation as an elected official so he made a more serious threat which plaintiff could only take as he should fear for his life. Then Sheriff Doughtie made good on the threat to have his deputies scare plaintiff and has now enlisted criminals to threaten and harass plaintiff while Sheriff Doughtie sit back and ignores the crimes against Plaintiff. Here Plaintiff has made it clear through multiple communications with NC Governor Cooper, NC Attorney General Josh Stein, plaintiff's lawyers and many other public officials that Plaintiff fears for his life from Sheriff Doughtie and the Dare County Sheriff's Dept. and now the Dare County District Attorney's Office. Plaintiff is entitled to equal protection of law even from threats made by law enforcement but has yet to receive any. And Plaintiff fully believes Sheriff Doughtie's threat "you're gonna know I was there" means he will and did use the authority of his office to inflict other kinds of abuses other than just doing Plaintiff bodily harm. Plaintiff wants to charge Sheriff Doughtie for this crime but Doughtie has enlisted the help of District Attorney's Womble, Cruden, and Bland to obstruct that justice. Ms. Hutten witnessed the threat by over hearing the phone

conversation after she had called Sheriff Doughtie about the cat killings and Sheriff Doughtie had asked to speak with Plaintiff. The threat occurred over Ms. Hutten's phone and phone records can confirm the call.

**26.CLAIM: Sheriff Doughtie and the Dare County Sheriff's Dept. have a policy,practice,standard,custom whereby there is no type of process where a citizen can make a written complaint against anyone working at the Dare County Sheriff's Dept. or any process for any disciplinary report to be filed or this process was deliberately and discriminatorily denied to plaintiff. To date there either is no process whereby the public can make written complaints and those complaints be made public or they are discriminatorily only keeping that right from plaintiff who has tried literally hundreds of times to make such complaints.**

47. If there is a process whereby a person can file a written complaint against a deputy or the sheriff himself within the Dare County Sheriff's Dept. or the NC District 1 District Attorney's Office, Plaintiff was denied this process and was thwarted in his efforts to file complaints against Sheriff Doughtie , Deputy Ruth, and other deputies in the Dare County Sheriff's Dept.. This would amount to a violation of Plaintiffs Due Process rights and an obstruction of justice on the part of all who took part. Sheriff Doughtie has received many many complaints against himself and his deputies which he openly acknowledges. At no time did Sheriff Doughtie offer, recommend, or notify Plaintiff of any formal or informal or official process for filing complaints. Plaintiff then proceeded to pursue making the complaints to the prior District Attorney and the current District Attorney, Andrew Womble. At one point a complaint letter was sent to DA Womble asking for an investigation of Sheriff Doughtie, his conduct, and lack of protection of law

for Plaintiff and the animals and cats being killed. DA Womble nor the prior District Attorney made any response or attempt to notify Plaintiff of any process whereby an official complaint could be filed. The letter along with many phone calls to the District 1 District Attorney's Office, and their office's phone message records, will provide proof Plaintiff sought to make such complaints but was completely denied any kind of complaint system. Plaintiff spoke directly to DA Womble's and the prior District Attorney's direct secretary on many occasions leaving detailed messages with the secretary, then followed up with additional phone calls when no return calls were ever made. If there is an official system in place to make such complaints against a sheriff or his deputies, or if action was ever taken to investigate such complaints from other citizens or person making said complaints then Plaintiff was obstructed from making his complaints and his rights to Due Process and Equal Protection Of Law have taken place. If there is No official system in place to make such complaints then it is an indication of the KKK style government described by Plaintiff in Dare County whereby these elected officials have unfettered power to abuse anyone they see fit to abuse with no one to complaint to who will take appropriate action to end the abuse. At this point it is known by Plaintiff that a District Attorney can petition a Superior Court Judge to remove an elected sheriff or other elected or non-elected official but these defendants refuse to make it known how the official complaint can be filed to get to the petition for removal. And each and every one of the defendants have been asked that question over and over again both verbally and in writing for a long period of time without any response. None of these defendants, due to their legal knowledge and status, can claim ignorance to the official process or that Plaintiff was diligently and repeatedly pursuing

filing the official complaints and asking for an official investigation. Especially, DA Womble, Governor Cooper, and Attorney General Stein. With every police department in the US having an official complaint process against officers and higher officials, including police departments that exist in Dare County, it is not a simple oversight to not have one for the sheriff's dept. in place also. Considering the length of time Plaintiff has been making his complaints against Sheriff Doughtie and his deputies for hundreds of violation of rights.

48. To add more weight of proof of Sheriff Doughtie's and Deputy Ruth's corruption, gang stalking of Plaintiff, and them making good on Doughtie's threats is the way in which they abused their discretion and went outside their duties as law enforcement when Plaintiff reported Billy Maxwell as a drug dealer on the change.org petition. Maxwell is a drug dealer Plaintiff has known most of his life and witnessed his drug dealings. Plaintiff had offered the identity of Kevin Morris's source for cocaine to Sheriff Doughtie almost 2 years before the change.org petition but not gotten any meaningful response from Doughtie or Ruth. Maxwell is one of a group from Virginia Beach, VA, who are Kevin Morris's source for cocaine and marijuana. And Sheriff Doughtie nor Deputy Ruth had ever been supplied with the name of Morris's source until the petition update on Dec. 29th 2017. Both Sheriff Doughtie and Deputy Ruth testified under oath in a Dare County District Court hearing on Feb. 6th 2019 that just days after the petition's update they contacted Maxwell and tried to convince him to take out cyber stalking charges on Plaintiff. But Maxwell declined. Proof of Sheriff Doughtie's and Deputy Ruth's illegal intentions to make up a false charge against Plaintiff and to obstruct justice comes right from their own testimony. At that point, were Doughtie and

Ruth are claiming probable cause none existed for contacting Maxwell. At that point they had no electronic communication to Maxwell and even if they could claim the petition's update was an electronic communication they only had one which would not meet the statutes requirement. They were literally fishing for victims with which to make Plaintiff suffer. Worse still there is no way they could have acted in that time frame to determine Maxwell was not exactly what Plaintiff reported him as being-a drug dealer. There are only 2 real explanations that could be considered for them contacting Maxwell without a thorough investigation-A) they wanted to abuse and punish Plaintiff with this false charge so badly that they didn't care if Maxwell was a drug dealer or B) they already knew Maxwell was a drug dealer and were acting to protect him and his drug ring. No other logical explanation could account for why they completely abandoned their law enforcement duty and contacted Maxwell without first doing a thorough investigation into Plaintiff's claim which would not have been possible in only 3 days after finding out Maxwell was a drug dealer and especially without contacting Plaintiff for the rest of the available information. This is also proof of the pattern of KKK style gang stalking Plaintiff has been detailing. A complete abandonment of any duty or legal reasoning to create a situation using their authority to abuse Plaintiff and to recruit anybody who they could use to hurt Plaintiff. This is the same pattern of recruitment of gang stalkers Sheriff Doughtie and Deputy Ruth have been using all along-Plaintiff reports a serious crime committed by someone and regardless of any proper procedure or protection of law for Plaintiff they recruit the person to try and make a false case against Plaintiff for meaningless acts they try to make criminal. Here it is obvious and proven by their own under oath testimony that Maxwell being a major drug dealer in VA

and NC was unimportant to them in order to get the false cyber stalking charge against Plaintiff.

**27. CLAIM: Sheriff Doughtie and Deputy Ruth created a life threatening scenario for the purpose of murdering plaintiff where they could manufacture a legal means to murder plaintiff as a justifiable homicide or police shooting. They have openly recruited criminals to be adverse parties to plaintiff and provided these criminals with rational, context, and opportunity to murder plaintiff and supported them by, with malice and forethought, created for them lies to justify the killing.**

49. Sheriff Doughtie and Deputy Ruth have engaged in a pattern for years of trying to manufacture a "Bad Guy" that they can legally kill or incarcerate to cover up the corruption Plaintiff has uncovered and exposed. The history is plentiful of acts by both defendants to manufacture a criminal history for Plaintiff to explain away their violations of law and duty in a continuous pattern of obstruction of justice. Sheriff Doughtie's threats no doubt puts on an onerous context to the continued display of taking sides against Plaintiff no matter the crime reported by Plaintiff. An perfect instance was the bombing of Plaintiff's home where plaintiff was assaulted by the responding deputy and no effort was made to apprehend the bomber. Christine Hutten has witnessed and watched while Sheriff Doughtie and Deputy Ruth have tried to turn every situation against Plaintiff even crimes she had reported and witnessed. Sheriff Doughtie and Deputy Ruth have either tried to create a false criminal history against Plaintiff when it was Plaintiff who was the victim of the crimes plaintiff was reporting or down played the victimization so the record would only reflect what Sheriff Doughtie and Deputy Ruth wanted it to reflect-that Plaintiff was the "Bad Guy" with no justification who needed to

be taken out of society by whatever means necessary. And Plaintiff has tried to thwart this plan, this attempt to create a false criminal history, so that they can get their kill or remove Plaintiff from society by contesting and documenting their acts in real time for the public record. Their plan was/is to abuse Plaintiff over the edge with mental abuse and cruelty hoping for an opportunity to use deadly force or excessive force or to create a fear in Plaintiff so that he will resist arrest for yet another petty false crime and he can be "taken out" by the arresting officer. Sheriff Doughtie and Deputy Ruth have dredged up a 27 year old conviction from Virginia, a conviction for a crime Plaintiff is not guilty of and has contested the conviction all along, to use as the back drop of their insidious plans. Despite efforts to notify them of the falseness of the VA conviction and the mere fact it is 27 years old, (what is Plaintiff lying in wait to commit another crime) made no difference to them and they dispensed their false information to whoever they needed to produce a network of false records to back up their real intentions. This would amount to attempted murder should any law enforcement body outside of the corruption in Dare County respond to Plaintiff's pleas for help. To continue to prejudice plaintiff for a 27 year old crime long after the punishment, long after the parole period has ended, is to admit the legal system does not work and cannot be trusted by society. And that after a felony conviction you are "no good" for the rest of your life-period. So law enforcement should do whatever necessary to take you out of society again-even if it means fabricating a need to kill or a false criminal act. And Sheriff Doughtie and Deputy Ruth have completed the first phase of the illegal plan by seeding the police records with false information and using the false conviction from VA to instill as much prejudice for and fear of Plaintiff with Plaintiff's neighbors and people in the community adverse to

Plaintiff's political views as possible every chance they get while Plaintiff waits in fear for when he will lose his life when this all plays out as Sheriff Doughtie and Deputy Ruth planned it. The tell of this insidious illegal plan is that they have recruited people to pose as stalking victims of plaintiff, had them falsely testify in Court, giving rise to their arming them selves in preparedness to a self defense, then Sheriff Doughtie and Deputy Ruth ignoring their attempts to create the need for a justifiable homicide by coming to Plaintiffs home and threatening him and taunting him when they are supposed to be stalking victims in fear for their own lives. Meanwhile it is Plaintiff who is made to fear for his life and Sheriff Doughtie and Deputy Ruth nor the entire Dare County Sheriff's Dept. giving any protection of law what-so-ever. Because it is Sheriff Doughtie's and Deputy Ruth's plan to have Plaintiff killed one way or the other or to abuse him until they can incarcerate Plaintiff forever. Plaintiff is trapped in the situation and trapped in his home because hiding in his home is the only means of protection against the gang stalkers and Sheriff Doughtie's and Deputy Ruth's plan. Both Plaintiff and Ms. Hutten see this plan playing out just as Sheriff Doughtie threatened to do and they live in irreparable fear for their lives everyday and the filing of this lawsuit has not caused the gang stalking to abate and has not deterred Sheriff Doughtie nor Deputy Ruth from continuing to abuse them. For them to still be adamantly against Plaintiff after he has been locked away in his home for 20 months now and has committed NO crimes is proof of their zealotry in taking out Plaintiff.

**28. CLAIM: Dare County, the Dare County Attorney, the Dare County Board Of Commissioners, Sheriff Doughtie and the Dare County Sheriff's Dept. created and enforced a discriminatory life threatening policy, practice, standard, custom of an**



**anti-environmentalist/anti-animal advocate hate campaign against all those who opposed their political position on beach closings and plaintiff was a victim of their actions. The Dare County Board Of Commissioners with the appearances of the Chairman and Vice Chairman sanctioned a public video which depicted environmentalist as quote;" American Terrorists" and sanctioned acts of violence,the killing of innocent animals, routine threats and intimidations, and promoted such acts as policy of Dare County. And plaintiff was the victim of such a policy and is still being victimized by the Gang Stalking that was part of the hate program.**

50. The reasons for the ongoing gang stalking which is still happening to present unabated by Sheriff Doughtie, Deputy Ruth ,the Dare County Sheriff's Dept. and other members of the community who they recruited is simple and obvious. People were coming to the National Park,the Cape Hatteras National Seashore, in groups at times, to help and preserve the endangered Sea Turtles and Birds.They would put up boarders and protective fences with the consent of the Park Service and people were running over the fences and barricades killing the endangered animals. When they reported this to the Park Service the response was that they only had 2 Park Rangers to patrol 50 miles of beaches. When this was reported to the Defenders Of Wildlife and the Audubon Society they found that no plan had been in place to protect endangered species since the Nixon administration. So they sued the National Park Service and forced them to come up with a plan to protect the animals. When the issue of lack of law enforcement to patrol came up the answer was to close the beaches to protect the animals. This created an issue for the local economy and the local community rallied to attack the

Defenders Of Wildlife and Audubon while simultaneously assaulting the Park Service for letting this happen. The local communities' position was that neither should have control over the access to the beaches and that Dare County should control the beach. The local reasoning was that the local community were animal loving conservationists who would never hurt any animals and could manage the beaches better than any outsiders or the federal government. They theorized that the Defenders Of Wildlife and Audubon Society had fabricated the turtle and bird run overs to gain political control of the beaches and that no animals were being hurt on the island at all. That this was all just a political act and that is what the Dare County Board Of Commissioners stated to the media and was the local communities position. They then released a video called "America's Beaches-History Of Hatteras Island" with featured interviews by the then Dare County Board Chairman and Vice Chairman which meant Dare County was sanctioning the video and the political position that the Audubon and environmentalists were quote: "American Terrorists" and that the "Endangered Species Act" should be repealed. The video was not about the History Of Hatteras Island. It was about the damage to the economy if beaches were closed and stated the position the local community had without the entire local community having it's input. It was a position that was being forced upon anyone who lived here. And this one way political point of view was playing out in public hearings on the issue with violence and threats being shouted at anyone supporting the Audubon or Defenders Of Wildlife. All of which is documented history published by the media. Plaintiff however was investigating on his own and uncovered a contradictory truth to what the local community was portraying to the public and media. Plaintiff noticed animals, a severe number of animals, being run over on

Hwy 12 then began photographing the kills as evidence. After learning from the media US Senator Hagan was supporting the Audubon Society, Plaintiff began e-mailing the photographs in real time to her. Plaintiff theorized then went on to find proof the animals were in fact being run down on the beaches and it was being done by a number of locals. The same locals he found deliberately running down animals on Hwy 12 which runs the length of the National Park. Outraged by this, without knowing the corruption involved, Plaintiff informed Sheriff Doughtie and the Dare County Board with photographs of the dead. This of course would be damaging if not devastating to the local position on beach closing and their lie that no animals were actually being run over. And millions of dollars of tourist money and tax dollars were at stake. Plaintiff believed they would want to catch the perpetrators and punish them to stop the animal run overs as common decency would predicate. However, this began an assault on Plaintiff and his presence in the community which continues to this day and a conspiratorial effort to suppress and discredit the evidence. The Sheriff informed locals that Plaintiff was informing against the community then stood by while they threatened and harassed Plaintiff. When Plaintiff sought help from the Dare County Board with numerous e-mails and photographs he got no response from the Dare Board. When he notified Governor Mc Crory with numerous e-mails and photographs he likewise got no response. As time went on he questioned when Senator Hagan was going to make public the photographs and evidence to clear up the false positions the local community and the Dare Board were relaying through the media to the unsuspecting public. It was then that he found out Senator Hagan had switched her support against the Audubon and was presenting legislation to over turn the Audubon victory in their federal lawsuit.

This meant that she had suppressed the photographs and evidence to keep the public in the dark about what was really happening on Hatteras Island to the animals. Senator Hagan's bill failed but then she conspired with Congressman Jones and got that bill passed the whole while keeping the truth about the animals being killed from the public. Meanwhile, Sheriff Doughtie and the Dare County Board made sure no one took Plaintiff seriously and that included crimes Plaintiff was reporting from the local community Sheriff Doughtie had inflamed against Plaintiff for his work to reveal the truth. However, Plaintiff persisted in photographing the dead animals many of which were being deliberately run down in front of his own house by the very locals who were killing them in other areas of the island. As a warning to Plaintiff and a boast of how they had law enforcement and political protections. And this assault on Plaintiff's life and conspiracy to cover up the truth still persists to present. It is apparent that the money involved is the motivation to keep the public in the dark about all of the events that took place during this time period and that Sheriff Doughtie, Deputy Ruth, the DA Womble and other officials would obstruct justice, fabricate lies, and do whatever necessary to keep it all silent. And the local community has not been called off or prosecuted for any of their crimes and deceit. It is Sheriff Doughtie's and the Dare County Sheriff's Dept's sole concern to discredit, punish and drive Plaintiff from the town for his acts against their mandated political position. And DA Womble, Cruden, Bland and now 2 Dare County Judges have now participated in the political conspiracy and cover up. It is not hard for the Court to see what the consequences would have been if the information Plaintiff had uncovered were made public. Millions of dollars lost. Public sentiment completely lost. The evidence Plaintiff uncovered would have had permanent

repercussions to the political positions of the local authorities suppressing this evidence. However, the number of pictures Plaintiff has taken is testament to the validity of the situation despite all their efforts to obstruct justice and suppress the truth. And likewise, the e-mails in real time tell a story of public officials being notified and not any of them responding as their oaths of office and duty dictated. Here in lies a true gang stalking event which is still ongoing. And all Plaintiff had to do to trigger it was report the crimes and the truth.

**29. CLAIM: When plaintiff tried to expose and report the hate campaign and animal killings by reporting them to the Board Of Commissioners in a letter, the response of the Board's Chairman to that letter was to back Sheriff Doughtie in all his illegal acts and rights violations directed at plaintiff and to obstruct any justice that was pleaded for in the letter. The response was literally for the Board to back the Sheriff's illegal agenda to stop plaintiff from exposing them and an acknowledgement of the KKK Style Government that was present in Dare County and the hate environmentalist campaign the Board was sanctioning.**

51. Proof of the KKK style government where they have subverted the constitutional protections of the citizens built into the design of government with an illegal conspiratorial allegiance between elected officials and Sheriff Doughtie being given the go ahead with the gang stalking and demise of Plaintiff is overwhelmingly provided in an e-mail from Dare County Board Chairman Warren Judge (deceased) to Sheriff Doughtie from Jan. 14th 2015. Attached to that e-mail is an e-mail from Plaintiff to Sheriff Doughtie that was forwarded to the entire Dare County Board Of Commissioners detailing that Plaintiff was aware of the conspiracy and cover up detailed in paragraph

50 above and that Plaintiff was making his discovery public information to expose the crime and putting Sheriff Doughtie on notice he was involved.

**From:** mymac <[felixdesign@embarqmail.com](mailto:felixdesign@embarqmail.com)>  
**Date:** January 14, 2015 12:24:02 PM EST  
**To:** Sheriff Doug Doughtie <[doug.doughtie@darenc.com](mailto:doug.doughtie@darenc.com)>  
**Subject:** Felix

This is what you call creating a permanent record for the public:

I AM THE VICTIM OF MULTIPLE CRIMES THAT HAPPENED IN YOUR JURISDICTION AND YOU HUNG UP ON ME BECAUSE YOU DO NOT LIKE ME EXERCISING MY "FREEDOM OF SPEECH" ONLINE my freedom to question the acts of elected officials acting as authorities. YOU just happen to be the "SHERIFF" who is responsible for the "EPIDEMIC OF ANIMAL CRUELTY" here on Hatteras Island and it is not anyone's but your responsibility to provide evidence and catch the criminals. The purpose of the petition was to alert people outside this area of what was happening to the animals here and to provide them with information of what authorities have been notified-all of which is within my rights as the victim of these crimes and the care taker of the cats and a witness to the crimes.

I agree that having you belittle me because the crimes against me have continued is not in my best interest. You apparently do not have any tolerance for anyone who does not agree with your political view of animal cruelty or the parameters of your job, so I will refrain from continuing to report crimes that occur to me or that I see happening to avoid offending your sense of responsibility. It is obvious that anyone who alerts people outside of this area about the violence occurring to the animals here is uncovering something Dare County wants to keep quiet and will be met with open hostility from you or the Dare County Board due to the fact it may compromise Dare County getting fed tax dollars for the Bonner Bridge, Hwy 12, beach renurishment, or legislation to reopen closed beaches. If that turns out to be the case or if there is a cover up of animals being killed it would be a conspiracy to defraud the public and federal government of tax funding in direct conflict with public interest. I cannot understand, other than that, why any request to stop the killings would generate such open hatred for the person reporting such crime with such frequency. I believe I have uncovered just such a conspiracy and that if the public knew about the animal killings here it would further destroy the economic outlook for Hatteras Island due to the fact the public would be offended by further tax dollars going to support such killings. I would be offended that my tax money is funding such animal killings which is why I have reported the crimes. Because you do not agree or it is conflicting with your plans, does not give you the right to treat me so

badly, assault my character, or violate my constitutional rights.

Yes I will send this to every news organization and animal welfare group because you are unresponsive to the situation and how it is ruining my life and the lives of my family. If that offends you I am sorry but I am more offended that I have to watch these animals being tortured and killed everyday while the authorities who live so well off my tax money do nothing.

Sincerely,  
Daniel Felix

ps. any further conversations, for my protection, will be through Peter Mac Queen of the Humane Society Of Eastern NC and their lawyers.

Make sure this Court understands Dare County Board Chairman Warren Judge was sanctioning the hate-Audubon/ hate-environmentalist video circulated by the community with his appearance on that video at the time. But Plaintiff was not aware of that video. Plaintiff believed that by informing the entire Dare Board of the Sheriff's illegal unconstitutional acts and behavior would result in action being taken by law to stop the cover up and assaults on plaintiff and the animals. But Chairman Judge's response, after being fully informed of the crimes and conspiracy by Plaintiff's e-mail, an e-mail and information that would warrant a legal inquiry by the Board, made the statement below in response:

From: **Warren Judge** <[warrenj@darenc.com](mailto:warrenj@darenc.com)>

Date: Wed, Jan 14, 2015 at 1:33 PM

Subject: Fwd: Felix

To: Doug Doughtie <[Doug.Doughtie@darenc.com](mailto:Doug.Doughtie@darenc.com)>

Doug,

I am sorry you have to put up with this behavior. Just want you to know that you are the best there is and I have your back 24 hours a day 7 days a week.

See you soon.

Warren

Chairman Warren Judge's response was not to uphold the rule of law and to investigate and bring Sheriff Doughtie to justice but to back the assaults on Plaintiff with the full weight of the Dare County Board Of Commissioners. And nor did any of the other elected Commissioners, including Plaintiff's representative, respond to stop the assaults on Plaintiff or to protect the public from lies and misinformation that had been distributed through the media. And the reason they did not act is either they were all in agreement to suppress the evidence Plaintiff had uncovered and obstruct justice or that they feared what was happening to Plaintiff would happen to them if they defied Chairman Judge and Sheriff Doughtie. I suggest the Court read Plaintiff's e-mail again to see how well Plaintiff articulated the illegal conspiracy and cover up in his e-mail then consider Chairman Judges response; "I have your back"; their could be no better evidence of the existence of the illegal conspiracy and the KKK style government that led to this lawsuit. And this illegal KKK style gang stalking assault on Plaintiff still continues to the present. No laws or limitations would prevent any of the above named defendants from stopping the assault now, making known the deception of the animal killings to the public, or taking action to bring the Sheriff and his deputies to justice along with the other criminals involved. Other than these defendants allegiance to the conspiracy and the KKK style government which they adhere. A local government where friends and co-conspirators occupy every level of authority and rather than uphold the law and protect the public as their duties demand, they protect one another from being exposed by whistle blowers and their victims.



52. The Court should note that there is a 10 year history of Plaintiff's efforts to expose the KKK style government and conspiracy in e-mail records, calls for police service, photographs, phone calls, physical letters etc. which is a consistent record of the events that are only partially detailed in the complaint and its amendment. A vast record exists to the illegal and unconstitutional acts and as other authorities become implicated additional defendants need to be added. Again the assistance of the FBI in investigating others involved such as other Board members, law enforcement, District Attorneys, Senator Hagan, Director Of the National Park Service, and Governor Mc Crory etc., many authorities who were notified by Plaintiff and it would have been a violation for them not to have acted, will be necessary. It should be obvious at this point that Plaintiff is detailing multiple federal crimes and the FBI is the appropriate investigative law enforcement body. Other records and communications, such as the one described in paragraph 51 above, could be hidden without the investigative authority of the FBI.

**30. CLAIM: The Dare County Board Of Commissioners along with the enforcement of Sheriff Doughtie have created an openly discriminatory process of public appearances before the Board and how they treat subjects matters that are opposed to their political beliefs. The policy, practice, standard, custom is that if you do not agree with the Board's political point of view you are not welcome to bring any issues for their consideration and they select and approve only those that adhere to their political views. This is a violation of Due Process, Freedom Of Speech, Equal Protection Of Law and a racist, classist, political discrimination against people like plaintiff and citizens with opposing political points of view. And any appearance before them results in discrimination and**

**then they make you a target of Gang Stalking by their supporters and political allies.**

53. Another clear and convincing fact about the rights violations of the KKK style government and mob rule is the threat and intimidation dissenters receive at public hearings before the Board and in town hall type forums. The Dare County Board holds public hearings and meetings about political and other issues and Sheriff Doughtie is suppose to provide security that assures persons are afforded their constitutional right to voice their opinions on public issues. However, the KKK style forums result in only their political position is presented and dissenters get intimidated by a mob rule mentality and if persistent gang stalked by the community. People have become well aware of the danger of attending these public meetings and hearings if they dare to oppose the community position. And this KKK style mob rule was evident in the hearings about the Audubon beach closings. A prominent Va. Beach doctor, Dr. Kayota, supported the beach closings and was mobbed and threatened by the local community as well as members of the Board. And at the time the Sheriff and his deputies could have identified the persons responsible for the threatening atmosphere and enforced a non-threatening public discussion which is required by law and the US Constitution. Rather than the one sided public farce that took place time and time again that still exists today. Dr, Kayota's beach front rental cottage was vandalized and in such a small community the Sheriff's Dept. could have at least identified the suspects but made no effort to cause the gang stalking to abate because it was being backed by the Sheriff and the Dare County Board. The threats of violence were so prevalent that it caused Dr. Kayota to install security cameras on his home in an almost crime less community, in a

rental cottage with nothing to steal in it. The security cameras are almost non existent in this community and were installed by Dr. Kayota for his safety and the safety of his family when visiting their cottage and not for the safety of his property as a first concern. As these threats continued over time and small acts made against him by others in the mob wanting to harass or damage him in some way became numerous he simply sold his beach cottage and made some non associated reasoning so he could get the local real estate companies, also supporting the mob and KKK style government, to sell the home where he claims to have taken a huge loss. But the fact remains they managed to run him out of town simply for his support of the Audubon. Still yet another example of the KKK style forum for public hearings was when Christine Hutten, who owns the home with Plaintiff, wrote a letter to the Dare County Board requesting the speed limit be lowered in front of her home for obvious reasons detailed in this complaint. After receiving the complete run around of lies by Sheriff Doughtie and his deputies as to who had jurisdiction over the speed change she received confirmation from NCDOT Officials that if the Dare County Board requested a speed limit change the NCDOT would change it without opposition. After years of being denied by the Board and Sheriff, after years of complaining to the NCDOT and NC Highway Patrol, it was that simple. However, the Dare County Board was opposed to lowering the speed limit and were in the process of covering up the animal killings reported by Plaintiff in front of his home and lowering the speed limit would amount to an admission of guilt to the animal run downs, so the Dare County Board never informed Ms. Hutten her request via her letter to the entire Board was even being considered. And the Dare County Board made the decision without her presence there. Nor would Ms. Hutten have felt safe in appearing

before the Board to address an issue the entire community was supposedly against. However, at the hearing Sheriff Doughtie was summonsed and he lied and said "there was no speeding problem in that area" with full knowledge of the thousands of deliberate animal kills reported to him by Plaintiff. A blatant lie to deny Ms. Hutten and Plaintiff any respite from the animal killings. The statements Sheriff Doughtie made and the clear opinion stated by the Board that the local community would not agree to any decrease in the speed limit are recorded in the video of the actual meeting. And Ms. Hutten's request was denied without her ever knowing it was being considered a clear indication of their KKK style government being lorded over the dissenters of their public positions. With the thousands of animal deaths photographed and reported to the Board and Sheriff Doughtie by Plaintiff and the obvious need to lower the speed limit to protect the animals in the absence of law enforcement, no other conclusion could be drawn to account for the complete lack of consideration to Due Process and Board procedure. But that is not the end of the evidence of their KKK style government in this respect. The cat killers from Ships Timber's Road, across from Plaintiff and Ms. Hutten's home, John and Kelly Guido, rental cottage owners and supporters of the hate-Audubon ideology, and not residents of Dare County, wrote a similar letter to the Dare County Board wanting the cat feeding to stop over in what they described as "their" neighborhood. [ the road and neighborhood of Plaintiff's ancestry] The Guido's were accommodated with their request and given the opportunity to appear before the Board to voice their disgruntled views of Plaintiff again without Plaintiff ever being told he would be the subject of the hearing. The Dare County Board and Sheriff went even further to accommodate anyone against Plaintiff and the cats by creating a law against

feeding feral cats without ever investigating the claims about the cat deaths. This is a stark, almost unbelievable, contrast of the treatment Ms. Hutten received trying to stop the animal deaths in front of her home with a mere speed limit change and the accommodations of a county wide ordinance being made for the Guido's who were trying to legislate their hate for cats, after having been reported to Sheriff Doughtie for killing cats. The recording of the hearing is rife with insults and false accusations made against Plaintiff, who was not summonsed or apprised of the hearing to defend himself , by both John and Kelly Guido who thanked the Sheriff and Board gushingly for passing the ordinance. And the most telling of the KKK style government is the admission that NO PUBLIC HEARINGS HAD TAKEN PLACE, no opposition was presented because no community members were made aware of it, and it passed unanimously by an unconstitutional vote claiming to be what the majority of the voters would want. So under this KKK style public farce laws are made in Dare County and dissenters get gang stalked and threatened. There is a complete lack of Due Process, Public Representation, and other constitutional safe guards being administered by this KKK style Dare County Board and their sole political position is enforced by the Dare County Sheriff and Dare County Sheriff's Dept. And the process of checks and balances guaranteed by the State and US Constitutions is no more than one corrupt government official investigating their friends in another corrupt government agency with no hope of any just conclusion.

54. It cannot be beyond the Court's, Governor Coopers, nor Attorney General Stein's perception to see how these rights violations played out over and over and over again committed by Sheriff Doughtie and Deputy Ruth then was aided by DAs Womble,

Cruden, and Bland. This consistent pattern of Plaintiff reporting serious crimes he was victimized by and witnessed with no action taken, then the slightest complaints used to intimidate Plaintiff from getting outside help or making the crimes public. In somewhat chronological order (without discovery): Plaintiff reported; the animals being run down deliberately on Hwy 12 continually over years, the animals being run down on the federal beach over years, the federal park being vandalized, arsons, Plaintiff being threatened with a gun, cats being brutalized and killed continually over years, people driving 80-100 mph almost every night in a drunken race, persistent speeding/reckless driving more than 20 over the speed limit over years, Plaintiff being held at gunpoint by the Guidos friends, Plaintiff's house being bombed with a stick of dynamite sized explosive, Plaintiff and Ms. Hutten being intimidated and threatened over and over, locals defrauding people in a real estate scheme that still goes on, drug deals going on almost every night, drug trafficking by affluent members of the community while the police advertise in the news they lack drug leads, persistent drunk driving, statutory rape and forceable rape on minors, nightly illegal fireworks that could cause wildfires, other animal abuses, cyber stalking threats to Plaintiff, etc., etc., NO ACTION TAKEN except maybe a frivolous farce of an investigation done when outside officials made some meaningless inquiry. Meanwhile, Sheriff Doughtie, Deputy Ruth and the entire Dare County Sheriff's Dept. act on behalf of anybody adverse to Plaintiff with complaints of trespass and cat feeding and the full weight of the law comes bearing down to instill justice against Plaintiff. And most recently, as recent as Jan. 8th 2018, Plaintiff being charged with 3 frivolous charges for cyber stalking of the criminals who were victimizing him, with NO electronic communications ever being sent to these criminals. AND this

was the response after they had come to Plaintiff's home on Dec. 26th 2017 and run down Plaintiff's cat Boo Jr. as Plaintiff watched from his shower window. And the responding officer, who did nothing, the same officer who refused to respond to Plaintiff's 911 for 3 hours when he was held at gunpoint, to that call for police service was Deputy Stowe an alleged cyber stalking victim's son. But then it goes even further, these defendants allow these criminals, who are now playing the role of alleged victims, AND their friends, to come to Plaintiff and Ms. Hutten's home on an almost everyday basis and threaten and intimidate them. This has been going on now for 22 months unabated by law enforcement and all these defendants. And this was their response when Plaintiff demanded justice then began publicizing the crimes on a federally protected petition and exercising his federally protected right to freedom of speech against their KKK style government that protected all these criminals. The Court cannot be expected to not see such a stark contrast of justice where not one of the crimes Plaintiff reported resulted in a prosecution while Plaintiff was being relentlessly pursued for trespass, cat feeding (which was not illegal until they criminalized it), and reporting crimes on the internet to Governor Cooper they falsely construed as acts of cyber stalking. While Plaintiff, the public and other victims of the crimes Plaintiff was reporting, got NO Equal Protection Of Law, Sheriff Doughtie, Deputy Ruth and other deputies, along with DAs Womble, Cruden, and Bland's sole focus was how to shut Plaintiff up, punish him, and rationalize the many crimes away and make it seem like Plaintiff was the bad guy. That would be a huge obstruction of justice and stretch of reality considering the lengthy public records to these events and the seriousness of the crimes that took place. Nor could the Court rationalize that Plaintiff's and Ms. Hutten's fear for their lives, after showing the horror

that there was an unassailable conspiracy amongst authorities to harm them, was unjustified. And their fear heightened when they realized there was nowhere left to turn for help and they were all going to come after Plaintiff to "finish him off"! There could be no greater of a prejudice shown by these defendants to Plaintiff but there is and it is still ongoing.

**31. CLAIM: Plaintiff and his partner, Christine Hutten's Freedom Of Religion have been violated repeatedly over the course of these defendants attacks. Christian and Native American religions believe animals to possess souls or spirits just like humans. And because of this they possess the same rights to their lives, endowed by the same creator as humans, that humans have and the law recognises. And plaintiff had a right to believe their Gods or Great Spirit required them to save animals who needed help. Here the homeless cats and other animals were being illegally killed and plaintiff was compelled by his religion to act on the animals behalf. All these defendants discriminated against him for it and thwarted his legal efforts to save these animals and did so with the malicious purpose to cause plaintiff mental and physical anguish and to make him suffer.**

55. Both Plaintiff's and Christine Hutten's rights to freedom of religion have been violated by each of these defendants. Plaintiff and Ms. Hutten subscribe to and are adamant about their religious belief that all animals have souls, or spirits, and are exactly like human beings in their rights to their lives. That any act to harm or kill them is identical to that committed against a human being. That any act to force them to treat them any less than a human being is a violation against their religion. That an animal's life is of the same value and equal to that of a human being. This is a religious belief



based on a cross between Christianity and Native American religion. That any and all acts to protect a human being is mandatory for any animal life and well being. This is the religious freedom they have expressed over and over again to defendants but has been violated repeatedly by each of them. The Court should take efforts to acknowledge this religious belief and assure that Plaintiff's and Ms. Hutten's, (a witness and additional victim) rights to religious freedom do not get further trampled or violated by the Court's proceedings. The Court should also consider whether the laws and policies that have led to this lawsuit were in violation of their religious beliefs.

**32. CLAIM: Plaintiff has been discriminated against for his political affiliations as an animal advocate, animal lover, and environmentalist and has had his rights violated to those freedoms.**

56. Plaintiff and Ms. Hutten clearly have been discriminated against for their political affiliations. The Court needs to consider Animal Advocate, Environmentalist, and Climate Change Activist all political affiliations if not separate but equally recognized as political parties the same as Republican and Democrat. Plaintiff contends that these are and have become the political parties of the modern generation. Voters recognize them as political parties and not just political issues. They are without a doubt political affiliations deserving the protection of the anti-discrimination laws of the US Constitution just like affiliations such as Civil Rights Activist and Women's Suffrage or Labor Union Activists. The US Constitution guarantees the right not to be discriminated against for political affiliation. The US Constitution does not provide that there can be only 2 political parties and everyone else lumped into an independent category. This in and of itself would be a discrimination dictated by the constitution. And it would not be consistent with history

when in the past the Communist Party and Nazi Party were both recognized as registered political parties. The need for registration and designation is also not specifically required by the US Constitution. And there are many historic registered political parties that do not encompass the masses that these 3 affiliations now represent. And in every public display by these 3 parties dissenters protest in opposition evident of an adversarial political process with separate political entities. Nor do they represent a single political issue but have a wide political range that represent their parties political stance. Animal Advocate-all things that help animals. Environmentalist-all things that help the environment and most recently Climate Change Activist -a range of political issues that encompass the entire world over. And all 3 operate in the same fashion but outside of the Republican and Democrat and Independent Parties. Here in the instant case Plaintiff and Ms. Hutten's political affiliations caused them much discrimination and were subjected to enough extreme prejudice to cause them fear from defendants and the community and they suffered damages leaving their lives in complete ruin from the ongoing gang stalking and rights depravations and violations.

57. In a letter received by Plaintiff from the NC Department Of Justice, dated June 30th 2017, from Meghan Ray, Animal Welfare Program Coordinator, on behalf of NC Attorney General Josh Stein also named on the letter, Ms. Ray states : "Thank you for discussing your concerns with our office about the welfare of the cats in Dare County on June 30, 2017. This office would like to inform you that your complaint was referred to the appropriate authority." "The Dare County Animal Control received the complaint and this office has encouraged them to undertake the appropriate investigation into this matter. The North Carolina Department Of Justice appreciates your concern and

interest in ensuring the humane treatment of animals in North Carolina." The letter clearly states the "appropriate authority" was forwarded the complaint which encompassed the years of animal cruelty to the cats and how many had died while the "appropriate authority", the Dare County Sheriff's Dept. and Dare County SPCA did nothing to stop it. Then after the letter when numerous other cats had been illegally killed, on Dec. 26th 2017, the day after Christmas, Plaintiff watched from the shower window in horror as a truck floored the accelerator and ran over his cat walking down the side of the road. Plaintiff called and reported the crime and as usual Deputy Stowe arrived and ignored the deliberate act to kill Plaintiff's cat, Boo Jr., with a vehicular assault. The picture clearly shows the cat hit off of the pavement 2-3 foot outside of the white line. When Plaintiff began putting this and other crimes he had been victimized by and witnessed on a change.org petition, Deputy Ruth promptly charged Plaintiff with a false crime of cyber stalking to shut him up about the Dare County Sheriff's Dept.'s protecting affluent white drug dealers and other corruptions Plaintiff had witnessed in Dare County. The Court should note that during the arrest, when Plaintiff confronted Deputy Ruth about the cat, Boo Jr., being run down off the road, Ruth accidentally revealed that Sheriff Doughtie had cameras up in front of Plaintiff's home, and when Plaintiff then stated "then you have the asshole who ran down Boo Jr. on camera and I want to press charges!" ,Ruth then tried to change his story and deny any cameras were there. Considering the letter to the NC Dept. Of Justice dated June 30th 2017 why weren't there cameras up to catch the people deliberately running down animals in front of Plaintiff's home on Dec. 26th 2017? Because Sheriff Doughtie and Deputy Ruth had no intention of acting on the complaint forwarded from NC Attorney General Josh Stein

at the NC Dept. Of Justice. Sheriff Doughtie's and Deputy Ruth's sole intention was to deny Plaintiff any respite from the ongoing gang stalking, to deny Plaintiff any protection of law what-so-ever, and to abuse, discredit and silence Plaintiff. To drive home the point, on March 24th 2019, 2 cats of Plaintiffs were shot 3 doors down and again Plaintiff reported the crimes on with all information needed to the NC Department Of Justices' Animal Cruelty hotline and no action is yet to be taken. A blatant disregard for the rule of law especially when it is a crime to discharge a firearm in a residential neighborhood. And Plaintiff has 2 other cats who escaped and went back into the cat hater neighborhood and have never showed up to eat again while Plaintiff is banned by letter from the Dare County Sheriff's Dept. from entering the neighborhood and rescuing his cats. All of which has been re-reported to the NC Attorney General Josh Stein and the NC Dept. Of Justice. AND the animal run downs continue and the gang stalking drivebys continue where they daily floor their vehicles to simulate animals being run down to this day Nov. 18th 2019. And animals have been run down and killed and run down and left injured and alive as recently as Oct. 2019. No action yet to be taken from any of these defendants despite being notified over and over and over again.

**33. CLAIM: Dare County and the Dare County Sheriff's Department has a policy, practice, standard, custom of discrimination that they enforce in violation of the US Constitution.**

**34. CLAIM: Plaintiff makes a constitutional challenge to the Dare County Cat Ordinance as previously noted.**

**35. CLAIM: Plaintiff makes the claim the Dare County Cat Ordinance is in violation of the NC Animal Cruelty Law.**

**36. CLAIM: The Dare County Attorney, District Attorney Womble, Sheriff Doughtie, and NC Attorney General Stein denied plaintiff the public information of their registered process agents on many many occasions that are needed to properly serve the lawsuit on them and are doing so to obstruct justice by thwarting the proper service of plaintiffs lawsuits and have and still are denying this public information to plaintiff to shield themselves from being held responsible in a court of law. This is a violation of Due Process, plaintiff's right to public information, and an open illegal obstruction of justice.**

**37. CLAIM: From the serving of plaintiff's first lawsuit, Sept. 26th, 2019 until now, against these defendants, plaintiff has been subjected to daily Gang Stalking by Kevin Morris, Chris Bock, David Stowe, and their friends in the community. Plaintiff has and is still being denied Equal Protection Of Law from these defendants and is still suffering the horrors of these defendants illegal acts and obstruction of justice. The current count of animals deliberately run down in front of plaintiff's home is now at 4039 and the current count of Homeless Cat Killings is now at 68. No effort has been made to stop the Gang Stalking these defendants initiated and are supporting and no effort has been made to stop the illegal animal and cat killings.**

Plaintiff has kept up his efforts to report and document every incident by reporting them to the Dare County Sheriff's Dept., Governor Coopers and NC Attorney General Steins websites as e-mails, to their current Assistant NC Attorney General Bryan Nicoles, and other law enforcement agencies including the NC Hwy Patrol, NC State Bureau Of Investigation, the Federal Bureau Of investigation and others. All incidents

were documented in writing in real time to have an accurate real time record of the ongoing Gang Stalking and Animal Killings. Plaintiff continued to document the Animal Killings with photographs and videos. Currently, there is also video of Kevin Morris gang stalking plaintiff at his home on multiple occasions and he is still committing threatening acts on a daily basis. There is also multiple other gang stalkers whose identities are yet unknown also threatening plaintiff but due to these defendant's denial of protection of law their identities are yet to be known. This is an ongoing rights violation and gang stalking and animal killing complaint.

**38. CLAIM: NC Attorney General Josh Stein failed to provide adequate oversight, training and disciplinary actions of the Dare County Sheriff's Department, Sheriff Doughtie and Deputy Ruth and other deputies yet known.**

**39. CLAIM: NC Attorney General Stein failed to enforce the NC Laws and NC State Constitution to prevent the abuse and injury of plaintiff, the homeless cats and other animals that were illegally killed.**

**40. CLAIM: NC Attorney General stein was negligent and deliberately indifferent to the rights violations and criminal acts committed against plaintiff and animals that are plaintiffs which caused severe injury and death, mental anguish, and financial damages.**

**41. CLAIM: NC Attorney General Stein violated his oath of office and duty to the public on multiple occasions.**

**42. CLAIM: Dare County in North Carolina as well as the Dare County Sheriff's Department created,imposed, and enforced a POLICY,PRACTICE, AND STANDARD,CUSTOM of rights violations, discrimination and**

**prejudice,unlawfulness,corruption, reckless and deliberate disregard for right and life, deliberate indifference to death,injury, and abuse of plaintiff and animals protected by law, of religious and political discrimination, of ethnicity discrimination, of political affiliation discrimination and it is still ongoing without interruption.**

**43. CLAIM: Dare County and the Dare County Sheriff's Department engaged in and facilitated a policy, practice and standard,custom of obstruction of justice both criminally and civilly. And has not ceased or desisted in those policy,practices, and standards,customs.**

**44. CLAIM: NC Attorney General Josh Stein created, imposed, and enforced a policy, practice, standard,custom of deliberate indifference to rights violations of all kinds, discrimination and prejudice, resulting in the deaths and injuries to plaintiffs, then compounded his deliberate negligence with a policy, practice, standard of ignoring communications and isolated his self from communications and attempts to have him uphold his duty and obligation in his role as NC Attorney General. He then doubled down on that deliberate indifference again by negligently and deliberately supplying false information to further isolate himself from his responsibilities.**

**45. CLAIM: The Dare County Board Of Commissioners and all members listed as defendants created,sanctioned, promoted, and are continuing the "deliberate indifference" to; and continuing the "custom,policy,practice, standard" of: violations of Civil Rights and US Constitutional Rights, discrimination and all the prejudices that go with it against persons political affiliations,their religious**

**beliefs,their financial social class,and their ethnicity, of animal cruelty and the illegal killing of homeless cats, the deliberate illegal running over of other animals on Hwy 12 and other roads in Dare County, sanctioning and promoting the hate campaign against environmentalists and animal advocates, enforcement of a Cat Ordinance that starves and kills cats in violation of both the NC Animal Cruelty Law and new Federal Animal Cruelty Law (cats that were all cared for have now died and many more are still starving and without medical attention), promoting a fraud against the public by commissioning and funding a false front of animal advocacy for the purpose of defrauding the public out of donations by contracting with the Dare County SPCA who use donated funds to kill cats on behalf of Dare County when those funds were donated to save the cats, the epidemic of drunk driving, speeding, and reckless driving, committing real estate manipulation and fraud, protecting and promoting the trafficking of illegal drug by affluent white drug dealers and targeting minority black and spanish and poor white drug users, using tax funds to intimidate and abuse community members of dissenting political and moral views, causing drug overdose deaths, protecting businesses funded by the illegal drug trade and continuing to use public tax funds to bully,gang stalk, and threaten people and running them out of Dare County for their dissenting opinions to the Boards, creating a hostile threatening environment for dissenters to appear before the Board,having and allowing dissenters to be gang stalked,harassed and threatened for appearing with their opinions before the Board, creating ordinance for affluent members of the community with no public hearings or inputs from the public, Obstruction Of**



**Justice both civilly and criminally, and have been informed of in writing and are continuing all of the above crimes and violations of rights.**

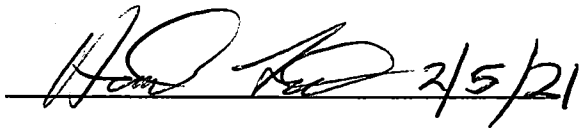
**46. CLAIM: Plaintiff is suing Governor Roy Cooper and Governor McCrory as well as NC Attorney General Stein in their individual and official capacities for their acts and omissions, for their blatant deliberate indifference, and defying their duty under the doctrine of Respondeat Superior, for the literally thousands of written correspondences and phone calls they deliberately ignored asking for help with all the above referenced and detailed acts.**

The Court should have noted from above that literally thousands of written correspondences and phone calls to their offices were made by plaintiff during the entire time period explained above and no effort was made what-so-ever to help plaintiff or give him relief when they were the very authorities responsible for providing that relief. The written emails, letters and possibly recorded phone calls are too numerous and costly for plaintiff to provide at such time but are permanent public records available under the freedom of information act and the court has authority and case law to support reviewing that public record or ordering it to be made part of the Court's record.

**ALL CLAIMS THAT DO NOT PRECEDE AN EXPLANATION ARE EXPLAINED AND DESCRIBED IN DETAIL IN OTHER CLAIMS ABOVE.**

## RELIEF SOUGHT

Plaintiffs seek injunctive relief that they will submit to the Court. Plaintiffs seek monetary damages in the amount of 10 million dollars. Plaintiff Daniel Felix seeks 4 million dollars cumulatively for all damages. The Plaintiffs Homeless Cats Of Hatteras Island and Non Property Animals Of Hatteras Island seek 8 million dollars compensation with plaintiff Daniel Felix as the administrator of those funds with the remainder if any to be in a trust to prevent future abuse and death to such animals. Plaintiff Daniel Felix seeks restoration of his rights and justice for the crimes committed against him and those that he witnessed. All Plaintiffs seek punitive damages to be prescribed by the Court or Jury. Plaintiffs again request a jury trial.

A handwritten signature in black ink, appearing to read 'Daniel Felix', followed by the date '2/5/21'.

Daniel Felix  
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